



U.S. Department of Justice

Ronald C. Machen Jr.  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

May 28, 2010

VIA EMAIL

Haytham Faraj, Esq.  
Puckett & Faraj, PC  
6200 Schaeffer Rd.  
Dearborn, MI 48126  
EMAIL: [Haytham@puckettfaraj.com](mailto:Haytham@puckettfaraj.com)

Re: United States v. Ramon S. Davila

Dear Mr. Faraj:

To facilitate the flow of discovery material between the parties and adequately protect identifiable personal information, the parties agree as follows regarding the documents provided by the United States today and in the future in the above-cited matter.

The United States may produce documents with certain identifiable personal information (defined as a person's name, address, Social Security number or other identifying number) to defendant, pursuant to defendant's discovery requests. The United States will produce these documents unredacted to the defendant.

The defendant, including defendant's counsel and their personnel, may use these documents only for purposes of the litigation, and may disclose them to non-parties to this litigation only as needed for the litigation. The defendant shall not file these documents with or submit them to the Court or reproduce their contents in any court filing unless the document or filing is placed under seal or all identifiable personal information contained in the document or filing has been removed. Within 90 days of the final conclusion of this litigation, defendant shall return the produced documents and all copies, as well as all notes, memoranda, summaries, or other documents containing information from the produced documents, to counsel for the United States, or shall destroy them and certify in writing to counsel for the United States that the documents have been destroyed.

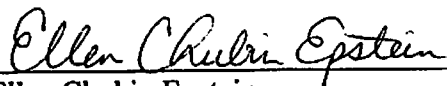
The procedures for use of the produced documents during any hearing or the trial of this matter shall be determined by the parties and the Court in advance of the hearing or trial. The parties shall consider redacting the documents to remove identifiable personal information,

request the Court to submit such documents under seal, code the documents to substitute a numerical or other designation for the name or other identifying information, request that any exhibit be placed under seal, introduce summary evidence where practicable which may be more easily redacted, and assure that all Social Security numbers have been removed. Neither party shall disclose these documents in the public record or in open court without prior consideration by the Court.

This agreement does not constitute an admission on the question of whether any particular material is properly admissible and does not constitute any admission on any potential objection to the admissibility of any material.

Sincerely yours,

Ronald C. Machen Jr.  
United States Attorney

  
Ellen Chubin Epstein  
Thomas E. Zeno  
Assistant United States Attorneys

I have read each of the two pages of this agreement. I understand and agree to the contents of this letter.

May 31, 2010  
Date

  
Haytham Faraj, Esq.  
Attorney for Ramon S. Davila