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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 WALTER LIEW, CHRISTINA LIEW, USA
PERFORMANCE TECHNOLOGY, INC.,
15 and ROBERT MAEGERLE,
16 Defendants.
17

Case No. CR 11-0573-JSW (NC)

**DECLARATION OF SIMONA A.
AGNOLUCCI IN SUPPORT OF
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL CERTAIN EXHIBITS TO
THE DECLARATION OF STUART L.
GASNER IN SUPPORT OF RENEWED
MOTION FOR ORDER REVOKING THE
DETENTION ORDER AND GRANTING
PRETRIAL RELEASE OF WALTER
LIEW**

Place: Courtroom A, 15th Floor
Dept.: Hon. Magistrate Judge
Nathanael Cousins

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I, Simona A. Agnolucci, declare and state that:

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Kecker & Van Nest LLP, located at 633 Battery Street, San Francisco, California 94111, counsel for defendants Walter Liew and USA Performance Technology, Inc. in the above-captioned action. I am duly admitted to practice law before this Court. Except where expressly stated, I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, could do so competently under oath.

2. Exhibits A-D to the Declaration of Stuart L. Gasner in Support of Defendant Walter Liew’s Renewed Motion for an Order Revoking the Detention Order and Granting Pretrial Release of Walter Liew (the “Gasner Declaration”) consist entirely of materials that have been designated by the Government as Confidential Materials.

3. Exhibits I and J to the Gasner Declaration consist of materials produced by the Government on a hard drive seized from a safety deposit box allegedly belonging to the Defendant. Although the Government has not yet designated any specific documents on that hard drive as confidential, it has indicated that it believes some of the materials on the hard drive may be confidential and subject to the Court’s Protective Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on November 20, 2012, at San Francisco, California.

/s/ Simona A. Agnolucci
SIMONA A. AGNOLUCCI