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USA PERFORMANCE TECHNOLOGY, INC.

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

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 WALTER LIEW, CHRISTINA LIEW, USA
PERFORMANCE TECHNOLOGY, INC.,
and ROBERT MAEGERLE,

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

**[PROPOSED] ORDER GRANTING
DEFENDANTS WALTER LIEW AND USA
PERFORMANCE TECHNOLOGY, INC.'S
MOTION FOR AN ORDER REQUIRING
THE GOVERNMENT TO SPECIFY KEY
DOCUMENTS UNDER RULE
16(A)(1)(E)(II)**

Date: February 27, 2013
Time: 11:00 a.m.
Judge: Hon. Nathanael Cousins
Place: Courtroom A, 15th Floor

1 Pending before the Court is Defendants’ Motion for an Order Requiring the Government
2 to Specify Key Documents. After considering the papers submitted by counsel, the applicable
3 law, the relevant pleadings and papers on file in this action, and the arguments of counsel, and
4 good cause appearing therefor, Defendants’ Motion is **GRANTED**.

5 The Court orders the Government, no later than thirty (30) days from the date of this
6 Order, to produce and identify the key documents that the Government intends to use in its case-
7 in-chief that are relevant to the current indictment. Thereafter, the Government is required to
8 supplement its list of key documents on a rolling basis, within thirty (30) days of the production
9 of new discovery.

10 The Government’s key documents production shall include at a minimum: (1) all
11 documents defining the alleged trade secrets; (2) the USAPTI plans and documents alleged to
12 contain trade secrets; (3) the contracts and other business documents defining the relationships
13 between and among the parties; (4) documents demonstrating participation of a foreign
14 government or instrumentality; and (5) documents that the Government contends show a
15 conspiracy or wrongful intent on any individual’s part.

16 IT IS SO ORDERED.

17 Dated: _____, 2013

18 HON. NATHANAEL COUSINS
19 JUDGE, UNITED STATES DISTRICT COURT