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12 Attorney for Defendant CHRISTINA LIEW

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 WALTER LIEW, CHRISTINA LIEW, USA
20 PERFORMANCE TECHNOLOGY, INC.,
and ROBERT MAEGERLE,
21 Defendants.

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

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBIT A TO THE
DECLARATION OF CHRISTINA BLAIS
IN SUPPORT OF REPLY IN SUPPORT
OF JOINT MOTION TO SUPPRESS
EVIDENCE**

Date: August 8, 2013
Time: 2:00 p.m.
Place: Courtroom 11, 19th Floor
Dept.: Hon. Jeffrey S. White

1 Pursuant to Civil Local Rule 79-5, defendants Christina Liew and Walter Liew hereby
2 move the Court for an administrative order to file under seal the following:

- 3 • Exhibit A to the Declaration of Christina Blais in Support of Reply in Support of
4 Joint Motion to Suppress Evidence (the “Blais Declaration”).

5 As explained in the accompanying Declaration of Simona A. Agnolucci, the above-
6 described document is an FBI interview memo of the type that typically is treated by the FBI as
7 confidential.

8 In addition, Paragraph 11 of the Protective Order entered by this Court on June 21, 2012
9 (Dkt. No. 168) provides that “[a]ny court filings containing Confidential Materials or a
10 description thereof shall be made under seal. In addition, the Confidential Materials or
11 descriptions thereof shall be clearly identified in such sealed filing.”

12 As explained in the accompanying Declaration of Simona A. Agnolucci, Exhibit A to the
13 Blais Declaration has been designated by the Government as C-2 under the Protective Order.

14 Accordingly, Mr. and Mrs. Liew respectfully request that the Court enter the Proposed
15 Order filed herewith and order that the above-described exhibit to the Blais Declaration be filed
16 under seal.

17 Dated: July 19, 2013

KEKER & VAN NEST LLP

19 By: /s/ Simona A. Agnolucci

20 STUART L. GASNER
21 SIMONA A. AGNOLUCCI
KATHERINE M. LOVETT

22 Attorneys for Defendants WALTER LIEW and
USA PERFORMANCE TECHNOLOGY, INC.

23 Dated: July 19, 2013

LAW OFFICES OF DORON WEINBERG

25 By: /s/ Doron Weinberg

26 DORON WEINBERG

27 Attorney for Defendant CHRISTINA LIEW
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