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STATE OF MICHIGAN
IN THE COURT FOR THE 52-1 JUDICIAL DISTRICT

PEOPLE OF THE STATE OF MICHIGAN,

Plaintiff,

v

D.C. 19-002619 FY
P.O. 19-65104
HON. TRAVIS REEDS

NICHOLAS MAXIMILLIA REMINGTON,

Defendant.

JESSICA R. COOPER (P23242)
OAKLAND COUNTY PROSECUTING ATTORNEY
1200 N. TELEGRAPH ROAD
PONTIAC, MI 48341

NEIL S. ROCKIND (P48618)
36400 WOODWARD AVE., SUITE 210
BLOOMFIELD HILLS, MI 48304-0913
ATTORNEY FOR DEFENDANT

RANDALL M. LEWIS (P46134)
2000 TOWN CTR., SUITE 2350
SOUTHFIELD, MI 48075-1309
ATTORNEY FOR DEFENDANT

STIPULATION AND PROTECTIVE ORDER

The People of the State of Michigan, by and through Jessica R. Cooper, Prosecuting Attorney in and for the County of Oakland, and Beth M. Hand, Assistant Prosecuting Attorney, and counsel for the Defendant, Neil S. Rockind and Randall M. Lewis, hereby stipulate and agree, and request an Order of the Court, as follows:

1. Purpose. The purpose of this Protective Order is to allow Defendant's attorneys to view the information retrieved from the cellular phone of decedent, Denis Preka.

2. Definitions.
 - a. Defense Counsel. "Defense Counsel" means the counsel of record representing Defendant and his co-counsel in the above-captioned matter, who have signed this agreement. This includes designated defense investigators and defense counsel's support staff. It

does not include counsel for any current or future co-defendant absent further Order of the Court.

b. Defendant. The Defendant shall be able to review with counsel all of the Protected Material, however, the Defendant shall not be given copies of any portion of the protected material until the same has been screened by Defense counsel and deemed by counsel to be relevant and material to the defense of this case. The Defendant shall comply with and agree to be bound by the terms of this Order, including, but not limited to, as a special condition of his Bond.

c. Protected Material. "Protected Material" shall mean any and all information contained on the discovery provided regarding the contents of the cellular phone utilized by the decedent in this case, Denis Preka. This discovery material may contain sensitive, confidential, and/or non-public information, which may include, by way of example and not by way of limitation, personal identifying information, and other private information (e.g. social security numbers, birth dates, telephone numbers, addresses and financial information). The parties understand and agree that the Protected Information should be protected from use and disclosure beyond what is reasonably necessary for the effective defense of this matter.

3. Production of Protected Material. The People agree pursuant to the order of this Honorable Court to produce to Defendant's attorney the information retrieved from the decedent's cellular phone by Detective Stempien of the Novi Police Department for the time period of February 18, 2019, through the phone's last use.

4. Use of Protected Material.

a. General. All Protected Material produced under this Protective Order is to be used solely for the purposes of this criminal proceeding and for no other purpose. Persons having access to Protected Material shall not disclose or provide Protected Material to any person not authorized under this Protective Order. No Protected Material may be made available to, disseminated, or in any manner revealed to and/or or discussed with, any other person, except

upon Court order.

b. Advice of Counsel. Nothing under this Protective Order shall bar or otherwise restrict defense counsel from rendering advice to the Defendant with respect to this action, and in the course thereof, relying in a general way upon examination of any Protected Material. However, in rendering such advice and in otherwise communicating with the Defendant, defense counsel shall not disclose the contents of any Protected Material contrary to the terms or intent of this Protective Order. Defense Counsel shall be responsible for advising his Client/Defendant, employees, and other members of the defense team of the contents of this Stipulation and Protective Order, and the potential consequences for a violation hereof; including but not limited to Contempt of Court. Any unauthorized disclosure may constitute a violation of this Court's Order.

5. Access to Protected Material.

a. Protected Material Filed With Court. Any pleadings that include or make reference to Protected Materials shall be filed under seal. Where reasonably practical, only the portions of documents consisting of Protected Material shall be lodged under seal. No motion or other request to file or lodge Protected Material under seal shall be required. Such Protected Material shall be filed or lodged in sealed envelopes or other appropriate sealed containers. Each sealed envelope or container shall be endorsed with the caption and case number of the action and a statement substantially in the following form:


This envelope is sealed pursuant to Order of the Court and contains Protected Material filed in this criminal matter, and is not to be opened or the contents thereof displayed or revealed except by the Court or upon order of the Court.

6. Amendment. This Protective Order may be amended by agreement of defense counsel and the People of the State of Michigan in the form of a written stipulation filed with the Court and subject to the Court's approval, or upon further Order of the Court.

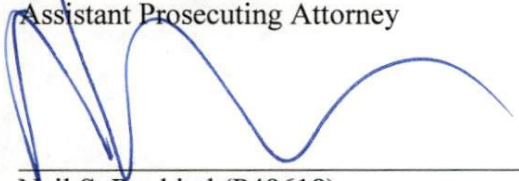
7. Effective Period. This Protective Order shall be effective immediately upon entry by the Court. It shall survive termination conclusion of the above criminal matter, and should the matter be bound over to the Circuit Court for trial the 6th Circuit court will have jurisdiction to enforce or modify its terms. Upon conclusion of this case, whether by dismissal, plea, or verdict, Defense Counsel shall return all said Protective Material to the People within 30 days.

8. Penalties for Breach. This Protective Order shall be strictly enforced by the Court.

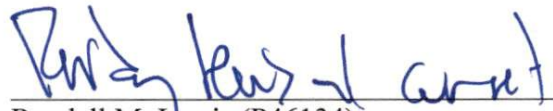
IT IS SO STIPULATED.



Beth M. Hand (P47057)
Assistant Prosecuting Attorney



Neil S. Rockind (P48618)
Attorney for Defendant



Randall M. Lewis (P46134)
Co-counsel for Defendant

ORDER

IT IS SO ORDERED.



HONORABLE TRAVIS REEDS

DATED: October 16, 2019