

Verified Correct Copy of Original 2/10/2022.

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR MULTNOMAH COUNTY

THE STATE OF OREGON,

No. 19CR53035 (Schultz)
No. 19CR53042 (Gibson)
No. 19CR53040 (Lewis)

Plaintiff,

AMENDED PROTECTIVE ORDER

v.

RUSSELL SCHULTZ,
JOSEPH GIBSON, and
MACKENZIE LEWIS

Defendants

FILED
22 FEB 10 AM 9:43
CIRCUIT COURT
FOR MULTNOMAH COUNTY

This matter having come before the court by stipulation of the parties, it is hereby
ORDERED that:

1. The State will provide defense counsel with certain confidential material pertaining to information provided to the Multnomah County District Attorney by the Multnomah County Sheriff on January 10, 2022, the entirety of which will be referred to in this order henceforth as "Produced Material".
2. The Produced Material copied and produced by the State pursuant to this order shall be maintained by the defense attorney, his or her investigators paralegals, secretaries and

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Order - Court Protective
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experts, the entirety of which will be referred to in this order henceforth as "Defense Team".

3. The Defense Team shall maintain the Produced Material in accordance with the terms of this order. The Produced Material shall be accessed, viewed, and used solely and exclusively by the Defense Team as the Produced Material pertains grand jury testimony, plea negotiations, motion practice, trial preparation, and sentencing recommendations, but for no other purpose.
4. The defendant's ability to access, view, and otherwise use the material is hereby restricted. If the defendant is being detained in the custody of a county jail or the Oregon Department of Corrections, the Defense Team may allow the Defendant to view the Produced Material during a consultation or visitation at the facility in which the defendant is in custody. If the defendant is not being held in custody, the Defense Team may allow the defendant and only the defendant to access and view the Produced Material.
5. The Defense Team is prohibited from providing copies of the Produced Material to anyone who is not on the Defense Team.
6. The defendant may not make, photograph, distribute, or possess any copies of the Produced Material.
7. The Defense Team and the defendant are hereby prohibited from posting the Produced Material or any portion of the Produced Material on the internet, the world wide web, or on any social media platform on any operating system including, but not limited to, Facebook, MySpace, Instagram, Google Plus, and Twitter.

a. The Produced Material shall not be duplicated, except the Defense Team may make one or more electronic copies that will be stored on defense counsel's computer or server.

b. The Defense Team may make, file, and serve such copies as are necessary in the event that any Produced Material is used as an exhibit or otherwise submitted to the Court provided that any such submission is made under seal.

c. The Defense Team may make additional copies of the Produced Material as necessary for trial notebooks and other necessary preparation for litigation.

d. The Defense Team and the defendant are prohibited from copying, printing, duplicating, electronically transferring, reproducing, and in any way distributing the Produced Material except as set forth in this ORDER.

e. The Defense Team and the defendant shall keep a copy of this ORDER with the Produced Material at all times.

9. The State shall identify, at the time of production to the defense, any material that it seeks to designate as Produced Material. Defense counsel shall have an opportunity to contest any such designation by application to this Court. Material not designated as Produced Material shall not be subject to the terms of this ORDER.

Dated this 10th day of February 2022,

 2022,

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