May 20, 2016 CENTRAL DISTRICT OF CALIFORNIA 1 EILEEN M. DECKER United States Attorney 2 DENNISE D. WILLETT Assistant United States Attorney 3 Chief, Santa Ana Branch Office 4 SCOTT D. TENLEY (Cal. State Bar No. 298911) Assistant United States Attorneys 5 8000 United States Courthouse 411 West Fourth Street 6 Santa Ana, California 92701 7 Telephone: (714) 338-2829 Facsimile: (714) 338-3561 8 Email: scott.tenley@usdoj.gov 9 Attorneys for Plaintiff UNITED STATES OF AMERICA 10 11 UNITED STATES DISTRICT COURT 12 FOR THE CENTRAL DISTRICT OF CALIFORNIA 13 SOUTHERN DIVISION 14 UNITED STATES OF AMERICA,) SA CR No. 15-155-JLS 15 Plaintiff, STIPULATION TO UNSEAL CASE AND RELATED RECORDS 16 V. MICHAEL R. DROBOT, 17 Defendant. 18 19 20 21 22 23 Plaintiff United States of America, by and through its 24 attorney of record, Assistant United States Attorney Joshua M. 25 Robbins, and defendant Michael R. Drobot ("defendant"), both 26 individually and by and through his counsel of record, Jason 27 DeBretteville, hereby stipulate as follows:

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CLERK, U.S. DISTRICT COURT

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1	1. On December 9, 2015
2	information and plea agreemen
3	government also applied ex pa
4	information and plea agreemen
5	cooperating with an ongoing i
6	the application to seal.
7	2. Public disclosure o
8	government would no longer un
9	investigation into the illega
10	3. Accordingly, the pa
11	longer a basis for keeping th
12	it be unsealed on May 26, 201
13	
14	IT IS SO STIPULATED.
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17	,
18	Dated: May 16, 2016
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21	j
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23	Dated: May 19, 2016
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1. On December 9, 2015, the government filed an			
information and plea agreement in the above-captioned case.	The		
government also applied ex parte to seal the case, including t	the		
information and plea agreement, because defendant was			
cooperating with an ongoing investigation. The Court granted			
the application to seal.			

- 2. Public disclosure of defendant's cooperation with the government would no longer undermine the government's investigation into the illegal activity of others.
- 3. Accordingly, the parties believe that there is no longer a basis for keeping the case under seal, and request that it be unsealed on May 26, 2016.

EILEEN M. DECKER United States Attorney

DENNISE D. WILLET Assistant United States Attorney Chief, Santa Ana Branch Office

/s/ SCOTT D. TENLEY Assistant United States Attorney

Attorneys for Plaintiff UNITED STATES OF AMERICA

/s/ per email
JASON DEBRETTEVILLE
Attorney for Defendant
MICHAEL R. DROBOT

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	CERTIFICATE OF SERVICE BY MAIL
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2	I, LETICIA N. ZAMBRANO, declare: That I am a citizen of the United
3	States and resident or employed in Orange County, California; that my
4	businesses address is United States Attorney's Office, 411 West Fourth
5	Street, Suite 8000, Santa Ana, California 92701;
6	That I am over the age of eighteen years, and am not a party to
7	the above-entitled action;
8	District Court for the Central District of California, at whose
9	discretion the service by mail described in this Certificate was made; that on May 20, 2016, I deposited in the United States Mails, United
10	States Attorney's Office, 411 West Fourth Street, Suite 8000, Santa Ana, California 92701 in the above-entitled action, in an envelope bearing
11	the requisite postage, a copy of:
12	STIPULATION TO UNSEAL CASE AND RELATED RECORDS
13	[PROPOSED] ORDER TO UNSEAL CASE AND RELATED DOCUMENTS
14	Addressed to:
15	Jason DeBretteville
16	Stradling Yocca Carlson & Rauth 660 Newport Center Dr
17	Suite 1600 Newport Beach, CA 92660
18	BY EMAIL: jdebretteville@sycr.com
19	At their last known address, at which place there is a delivery service by United States Mail.
20	This Certificate is executed on May 20, 2016, Santa Ana,
21	California. I declare under penalty of perjury that the foregoing is
22	true and correct.
23	
24	Leticia N. Zambrano LETICIA N. ZAMBRANO
25	DELICIA N. DANDRANO
26	
20 200	

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