

1 Jeffrey H. Rutherford (State Bar No. 181695)  
Crowell & Moring LLP  
2 515 South Flower Street, 40th Floor  
Los Angeles, California 90071  
3 Telephone: (213) 622-4750  
4 Facsimile: (213) 622-2690  
Email: jrutherford@crowell.com

5  
6 Terree Bowers (State Bar No. 89334)  
Arent Fox LLP  
7 555 West Fifth Street, 48th Floor  
Los Angeles, California 90013  
8 Telephone: (213) 443-7573  
9 Facsimile: (213) 629-7401  
Email: terree.bowers@arentfox.com

10  
11 Attorneys for Defendant  
Michael D. Drobot

12 **UNITED STATES DISTRICT COURT**  
13  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15  
16 **SOUTHERN DIVISION**

17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 v.  
20 MICHAEL D. DROBOT,  
21 Defendant.

CASE NO. SA CR 14-00034-JLS  
**STIPULATION TO ALLOW TRAVEL**

22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**STIPULATION**

Plaintiff United States of America and Defendant Michael D. Drobot, by and through their counsel of record, hereby stipulate as follows:

1. On March 31, 2014, Michael D. Drobot appeared before the Honorable Douglas F. McCormick, United States Magistrate Judge, for his initial appearance. Magistrate Judge McCormick fixed bail in the amount of a \$5,000 unsecured bond, ordered Mr. Drobot to surrender his passport, and restricted his travel to California, Oregon, Texas, Michigan and Colorado, unless approved by the Court.

2. Mr. Drobot requests approval to travel to New York, New York, from January 3-6, 2017. The purpose of this trip is for meetings with lawyers and consultants.

3. Mr. Drobot is in compliance with the terms and conditions of his release, as confirmed by Pretrial Services Officer Erika Pimentel.

4. Mr. Drobot or his counsel will provide travel details and a flight itinerary to Pretrial Services.

///  
///  
///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

5. The government and Pretrial Services have no objection to Mr. Drobot’s travel for the purpose of attending meetings with lawyers and consultants, as confirmed by Assistant United States Attorney Joseph McNally and Pretrial Services Officer Erika Pimentel.

IT IS SO STIPULATED.

DATED: December 19, 2016 EILEEN DECKER  
United States Attorney

/s/ Joseph McNally  
Assistant United States Attorney  
Attorneys for Plaintiff  
United States of America

DATED: December 19, 2016 CROWELL & MORING LLP

/s/ Jeffrey H. Rutherford  
Attorneys for Defendant  
Michael D. Drobot

**E-Filing Signature Certification:**

I, Jeffrey H. Rutherford, was given authorization to e-sign on behalf of Assistant United States Attorney Joseph McNally on December 16, 2016.

/s/ Jeffrey H. Rutherford  
Attorneys for Defendant  
Michael D. Drobot

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 515 S. Flower Street, 40<sup>th</sup> Floor, Los Angeles, California 90071-2258.

On **December 19, 2016**, I served the foregoing document described as **STIPULATION TO ALLOW TRAVEL** on the parties in this action by placing true copies thereof enclosed in a sealed envelope(s) addressed as follows:

**PLEASE SEE ATTACHED SERVICE LIST**

**(BY MAIL)**

I placed said document in an envelope addressed as shown on the service list. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing with the United States Postal Service. Under that practice, said correspondence will be deposited with the United States Postal Service the same day in the ordinary course of business. I sealed said envelope and placed it for collection and mailing on the date stated below to the address stated on the service list following the firm’s ordinary business practices.

**(ELECTRONIC MAIL)**

A true and correct copy of said document was electronically transmitted to the addressee marked with an ^^^.

**(FEDERAL)**

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on **December 19, 2016** at Los Angeles, California.

/s/D. Garlow  
D. Garlow

**SERVICE LIST**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Joseph McNally, AUSA^^^  
Scott Tenley, AUSA  
Office of the U.S. Attorney  
Criminal Division  
411 West 4th Street, Suite 8000  
Santa Ana, CA 92701-4599  
Joseph.McNally@usdoj.gov  
Scott.Tenley@usdoj.gov

Terree Bowers^^^  
Arent Fox LLP  
555 West Fifth Street, 48th Floor  
Los Angeles, California 90013  
Telephone: (213) 443-7573  
Facsimile: (213) 629-7401  
terree.bowers@arentfox.com

Erika Pimentel, Supervisor  
United States Pretrial Services  
U.S.D.C. Santa Ana Branch  
Ronald Reagan Federal Building  
411 West Fourth Street, Room 4070  
Santa Ana, CA 92701-4596  
(714) 338-4550  
Fax (714) 338-4570