

1 FRANK W. HUNGER  
Assistant Attorney General  
2 ROBERT S. MUELLER, III (Cal. BN 59775)  
United States Attorney  
3 DAVID J. ANDERSON  
ARTHUR R. GOLDBERG  
4 MARK T. QUINLIVAN (D.C. BN 442782)  
U.S. Department of Justice  
5 Civil Division; Room 1048  
901 E Street, N.W.  
6 Washington, D.C. 20530  
Telephone: (202) 514-3346

7 Attorneys for Plaintiff

8  
9 UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO HEADQUARTERS

11 UNITED STATES OF AMERICA, )  
12 )  
Plaintiff, )  
13 )  
v. )  
14 )  
CANNABIS CULTIVATOR'S CLUB; )  
15 and DENNIS PERON, )  
16 )  
Defendants. )

Nos. C 98-0085 CRB  
C-98-0086 CRB  
C 98-0087 CRB  
C 98-0088 CRB  
C 98-0245 CRB

[PROPOSED] PROTECTIVE ORDER LOG

17 AND RELATED ACTIONS )  
18 )

Date: None set  
Time: None set  
Courtroom of the Hon. Charles R. Breyer

19 Pursuant to Defendant's Protective Order, entered on October 8, 1998, plaintiff, the United  
20 States of America, hereby provides the Court with the following Protective Order Log.

21 1. On November 25, 1998, counsel for the government contacted all those persons and/or  
22 components within the Department of Justice, including the Drug Enforcement Administration, to  
23 whom the Declaration of Michael M. Alcalay, M.D., M.P.H., and the Exhibit attached thereto  
24 ("Alcalay Declaration"), may have been circulated, and requested that any and all copies of the  
25 Alcalay Declaration be returned to counsel.  
26

1 2. Counsel for the government further conducted a search of my own office, as well as the  
2 official case file in these related actions, and retrieved two copies of the Alcalay Declaration.


3 3. In response to the search request of November 25, 1998 for any and all copies of the  
4 Alcalay Declaration, counsel for the government was provided with four copies of the Alcalay  
5 Declaration from different components of the Department of Justice, including one copy that was  
6 provided by the Office of Chief Counsel of the Drug Enforcement Administration. Counsel for  
7 the government further was informed in writing by the Office of the Chief Counsel of the DEA  
8 that the copy of the Alcalay Declaration that had been provided to this office was not further  
9 circulated within the DEA.

10 4. Upon receipt of these copies, and upon receiving assurances from other components of  
11 the Department of Justice that no other copies of the Alcalay Declaration remained, counsel for  
12 the government, on December 8, 1998, provided counsel for the defendant, Morrison & Foerster  
13 LLP, with the six copies of the Alcalay Declaration in the possession of the government, by  
14 overnight delivery.

15 Respectfully submitted,

16 FRANK W. HUNGER  
Assistant Attorney General

17 MICHAEL J. YAMAGUCHI  
18 United States Attorney

19  
20   
21 DAVID J. ANDERSON  
22 ARTHUR R. GOLDBERG  
23 MARK T. QUINLIVAN  
24 U.S. Department of Justice  
Civil Division, Room 1048  
901 E St., N.W.  
Washington, D.C. 20530  
Tel: (202) 514-3346

25 Attorneys for Plaintiff  
26 UNITED STATES OF AMERICA

27 Dated: December 8, 1998