

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA :
 :
 v. : **CRIMINAL NO. 1:21-CR-00050-CRC**
 :
 :

JENNIFER LEIGH RYAN
JASON LEE HYLAND
KATHERINE STAVELEY SCHWAB

:
 :
 Defendants. :

**STIPULATION REGARDING RETURN OF DIGITAL DEVICES AND
ELECTRONICALLY STORED INFORMATION**

The United States of America and defendant Jennifer Leigh Ryan (“Defendant”) hereby agree and stipulate as follows:

RECITALS

1. On or about April 1, 2021, pursuant to court-authorized search warrants in Case Nos. 4:21-MJ-030, 4:21-MJ-032, and 4:21-MJ-226 (Eastern District of Texas), government agents seized from the defendant’s residence and/or person and searched the contents of certain digital devices and electronically stored information.

2. Defendant has requested the return of the following specified digital devices and electronically stored information (the “Digital Media”):

an Apple iMac Computer, Model A1418, serial number C02X31Q5J1G5

a Samsung Tablet

an Apple Laptop, Model A1466, serial number C02QL3Z8G941

an Apple iPhone, Model A2161, serial number 353905108413009.

3. The government has created an exact and accurate image (the “Image”) of each of the Digital Media specified in paragraph 2 by performing an extraction for the purpose of searching the Image.

4. The government intends to use materials discovered as a result of its search(es) as evidence in the pending and ongoing investigation and prosecution including, possibly, introducing those materials into evidence at trial or other proceedings.

STIPULATION

Accordingly, the parties AGREE and STIPULATE as follows:

1. The Images are accurate duplicates of the Digital Media and were created using reliable methods and Defendant waives the right to object to the admissibility of the Images of the Digital Media and the right to question witnesses or make arguments concerning the reliability of the methods used to create the Images.

2. The government will retain, and has provided to defense counsel, the Images extracted from the Digital Media.

3. The Digital Media will be returned to Jennifer Leigh Ryan.

4. The government will retain the Images of the Digital Media, including all evidence thereon, for use at any trial and any other proceedings in this matter.

5. The Images of the Digital Media and/or any other copies are “admissible [into evidence] to the same extent as the original,” within the meaning of Federal Rule of Evidence 1003.

6. The government may continue to examine the Images for materials identified in the Search Warrant consistent with the terms of the Search Warrant.

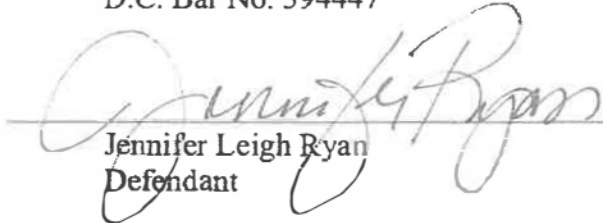
So stipulated.

Respectfully submitted and agreed,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar Number 415793

Date: 10/15/2021 By: /s/ Karen Rochlin

Karen Rochlin
Assistant United States Attorney detailee
99 N.E. 4th Street
Miami, Florida 33132
D.C. Bar No. 394447

Date: 4/8/21 

Jennifer Leigh Ryan
Defendant

Date: 10/11/21 

Guy L. Womack
Attorney for Defendant