

1 KAUSHAL NIROULA  
2 Booking No. 200910575  
3 P.O. Box 1748  
4 Indio, California 92202  
5 kniroulalegalfiling@gmail.com  
6 Defendant in Pro Per

FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

AUG 10 2012

K. HINOS

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 COUNTY OF RIVERSIDE, INDIO BRANCH

9  
10 THE PEOPLE OF THE STATE OF  
11 CALIFORNIA,  
12 Plaintiff  
13 Vs.  
14 KAUSHAL NIROULA, Et. Al.  
15 Defendants  
16  
17  
18  
19

Case No.: INF064492

ORDER OF THE COURT FOR JIM  
ATKINSON DEFENSE TECHNICAL  
SURVEILLANCE COUNTER  
MEASURES EXPERT RE  
WORKPRODUCT ISSUED UNDER  
SEAL.

20 It is hereby ordered by the Court that Jim Atkinson TSCM Expert, that Mr. Jim Atkinson  
21 be present at Indio California no later than 8:00 AM Monday August 13<sup>th</sup> 2012 and

22 As advised and informed by Kaushal Niroula in Pro Per, Mr. Atkinson is to obtain all  
23 Mirror Images to be provided to him by Daniel Carlos Garcia in Pro Per and ensure with  
24 Chris Pavan Defense Expert for Daniel Garcia, to confirm as to the chain of custody of  
25 the Mirror Images.

26 Mr. Atkinson is to make all appropriate provisions for appropriate Internet Access and  
27 analyze any and all available Source Codes for one technology HYDRA as mentioned in  
28 Mr. Niroula's opening statements and prepare for a live demonstration of the  
applicability of HYDRA to the court and the Jury as part of Mr. Niroula's defense as  
advised and informed to this court by Mr. Niroula.

1 Mr. Atkinson is to prepare and for understanding of HYDRA to have a face to face  
2 meeting with Kaushal Niroula in Pro Per & Daniel Carlos Garcia in Pro Per at the Indio  
3 Jail as well as the Indio Court House in Order to have the program functioning and  
4 running.

5 Mr. Atkinson is Ordered to enter into a proprietary agreement of preservation of  
6 Intellectual property of Mr. Daniel Carlos Garcia to ensure Mr. Garcia's Intellectual  
7 property rights as to HYDRA is preserved.

8 In addition Mr. Jim Atkinson is to review any and all documents found in the Mac Book  
9 Pro Associated with Daniel Carlos Garcia by the People and obtain any and all  
10 documentation associated with Electronic Surveillance/ Electronic Espionage / Hacking  
11 and prepare a report as directed by Mr. Niroula.

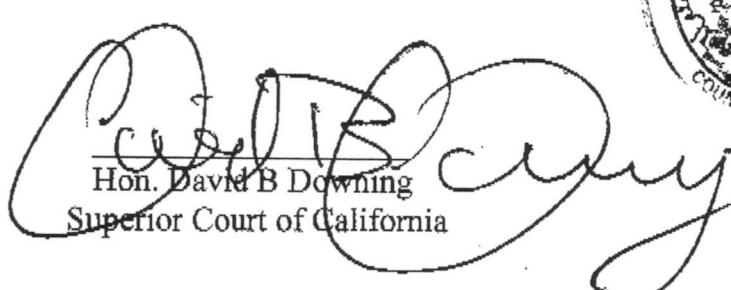
12 In addition Mr. Atkinson is Ordered to obtain and bring bring any and all equipment to  
13 Indio California associated to and necessary to conduct technical tests and present his  
14 testimony regarding the following as advised to the court by Kaushal Niroula in Pro Per  
15 of being presented in his defense:

- 16 1. Cell Phone Tower Pinging Faking.
- 17 2. Technical Surveillance Counter Measures (TSCM)
- 18 3. Proof of Technology and white paper on HYDRA.

19 Mr. Atkinson is further permitted Ordered to work directly at the Direction of Kaushal  
20 Niroula in Pro Per as the attorney of Record on all technical Matter's Relevant to the  
21 case and without any directions from S Stephen Spring Advisory Counsel of Record due  
22 to Mr. Spring's conflicting schedules and unavailability to provide immediate guidance  
23 and assistance in this matter.

24 The Court Orders all communication conducted between Mr. Niroula as the attorney of  
25 Record in his Pro Per Capacity and Mr. Atkinson as an Expert under the Attorney work  
26 product doctrine to be privileged.

27 It is so ordered on the 10<sup>th</sup> day of August 2012.

28  
  
Hon. David B Downing  
Superior Court of California

