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Attorneys for Dwight Hammond and Steven Hammond

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 10-60066-HO
	)	
Plaintiff,	)	SECOND MOTION FOR DISCOVERY
	)	
vs.	)	
	)	
STEVEN DWIGHT HAMMOND and	)	
DWIGHT LINCOLN HAMMOND,	)	
	)	
Defendants.	)	

TO: Assistant United States Attorneys Kirk Engdall and Frank Papagni:

Defendants, Steven Dwight Hammond or Dwight Lincoln Hammond, Jr., by and through their attorneys, Lawrence Matasar and Marc Blackman, hereby request and move for an order of discovery directing the United States Attorney to disclose, produce, and make available for examination and copying by defense counsel or their agents the following items, whether in the direct, physical possession, custody, control,

or knowledge of the United States Attorney, or any law enforcement agent, or which by the exercise of due diligence may become known to the attorneys for the Government.<sup>1</sup>

1. A list of all fire activity and all lightning strikes for the Steens Mountain – Frenchglenn area for the period in the indictment, 1982 – 2006.

2. All BLM news releases for 1982 – 2006 covering the Steens Mountain – Frenchglenn area.

3. All Resource Order Forms, generally maintained at the Burns Interagency Coordination Center (BICC), for the fires listed in the indictment.

4. BLM Fire Trespass Handbook H-9238-1.

RESPECTFULLY SUBMITTED this 9th day of June, 2011.

/s/ Marc Blackman  
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/s/ Lawrence Matasar  
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<sup>1</sup> See Discussion at 30 – 33 of Defendants’ First Motion for discovery regarding the prosecutor’s duty of inquiry and continuing discovery.