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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,	)	Case No. 3:16-CR-00051-BR-09
	)	
Plaintiff,	)	
	)	DEFENDANT’S MOTION FOR HEARING
vs.	)	RE: DISCOVERY MANAGEMENT,
	)	PRESERVATION OF EVIDENCE AND FOR
JASON PATRICK,	)	PROVISION OF DEFENSE ACCESS TO
	)	CRIME SCENES
Defendant	)	
<hr/>	)	(ORAL ARGUMENT REQUESTED)

COMES NOW Defendant, Jason Patrick, by and through his attorney, Andrew M. Kohlmetz, and hereby requests that this Court issue an appropriate Discovery Management Order after a hearing at which all parties may be heard on issues related to the following:

- A) The preservation of any crime scene(s) and any evidence located at, in or near the Malheur National Wildlife Refuge or other crime scene(s) pertinent to this Indictment and investigation.
- B) Provision for defense attorney(s) and/or their agents/employees to access the Malheur National Wildlife Refuge or other crime scene(s) once such sites are secured by law enforcement.


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- C) Provisions for the visual and audio recordation of any and all crime scene processing that occurs, and the provision of unedited copies of any such recordings to the defense.
- D) Any other discovery related matters that may arise at the hearing or otherwise.

This Motion is made in accordance with Rules 2, and 16 of the Federal Rules of Criminal Procedure, the Fifth Amendment to the U.S. Constitution, and the attached Memorandum in Support.

Respectfully submitted this 11<sup>th</sup> day of February, 2016.

  
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Andrew M. Kohlmetz, OSB 955418  
Attorney for Defendant Patrick