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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**

**Plaintiff,**

**JOINT CONSOLIDATED  
DEFENSE MOTION AND  
ASSERTIONS OF  
CONSTITUTIONAL RIGHTS**

**v.**

**AMMON BUNDY,  
JON RITZHEIMER,  
JOSEPH O'SHAUGHNESSY,  
RYAN PAYNE,  
RYAN BUNDY,  
BRIAN CAVALIER,  
SHAWNA COX,  
PETER SANTILLI,  
JASON PATRICK,  
DUANE LEO EHMER,  
DYLAN ANDERSON,  
SEAN ANDERSON,  
DAVID LEE FRY,  
JEFF WAYNE BANTA,  
SANDRA LYNN PFEIFER ANDERSON,  
and KENNETH MEDENBACH,**

**Defendants.**

The defendants, through FPD Lisa Hay, respectfully submit the following joint motion and assertions of Constitutional rights.

1. Defense counsel stipulate that they each join every motion filed by other defense counsel, to the extent they have standing, for purposes of receiving relief, unless they file a contrary statement. The defendants move for a court order approving this stipulation and eliminating the need for each attorney to file a motion to join other pleadings.

2. Speedy Trial Demand: each defendant asserts a constitutional and statutory right to a speedy trial. U.S. Const. Amend VI; 18 U.S.C. § 3161. *See Barker v. Wingo*, 407 U.S. 514, 530 (1972) (noting that defendant's assertion of speedy trial right is one factor to consider when evaluating constitutionality of any delay in trial).

3. Fifth and Sixth Amendment Rights: Each defendant asserts his or her rights under the Fifth and Sixth Amendments to the assistance of counsel before any questioning, to remain silent, and against self-incrimination. *See Davis v. United States*, 512 U.S. 452, 459 (1994) (noting that the *Miranda* right to counsel must be invoked "unambiguously"); *Berghuis v. Thompkins*, 560 U.S. 370, 381 (2010) (stating policy reasons for preferring unambiguous invocation of right to remain silent).

Respectfully submitted on February 19, 2016.

/s/ Lisa Hay

Lisa Hay

Federal Public Defender