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Attorney for Defendant O'Shaughnessy

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,

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, KENNETH
MEDENBACH, BLAINE COOPER,
WESLEY KJAR, COREY LEQUIEU,
NEIL WAMPLER, JASON CHARLES
BLOMGREN, DARRYL WILLIAM
THORN, GEOFFREY STANKE, TRAVIS
COX, and ERIC LEE FLORES**

**JOINT STATUS REPORT:
SUPERSEDING PROTECTIVE
ORDER**

Defendants.

The defendants, through Amy Baggio, and the government, through AUSA Craig Gabriel, submit the following Joint Status Report: Superseding Protective Order, in accordance with the Court's Order of March 9, 2016 (Docket No. 285, Sealed).

CERTIFICATION OF CONFERRAL: Undersigned counsel certifies that Assistant United States Attorney Craig Gabriel was provided a copy of, and consulted regarding the content of, this Joint Status Report: Superseding Protective Order.

The defendants¹, other than Ammon Bundy, have conferred and agree to the terms of the Proposed Superseding Protective Order, filed herewith.

Respectfully submitted on March 23, 2016.

/s/ Amy Baggio

Amy Baggio, OSB #011920

503-222-9830

Attorney for Defendant O'Shaughnessy

¹ Because counsel for Joseph O'Shaughnessy has been unable to have any communication with him since March 3, 2016, when he was arrested in Phoenix, Arizona, on the Nevada indictment, Ms. Baggio can make no representations on Mr. O'Shaughnessy's behalf. Undersigned counsel is filing this report in her role as coordinating panel attorney.

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

AMMON BUNDY, et al.,

[Proposed] PROTECTIVE ORDER

Defendants.

Upon motion of the United States, the Court being advised as to the nature of this case, and good cause being shown, it is hereby

ORDERED that, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, defense counsel may provide copies of discovery only to the following individuals:

- (1) The defendants in this case;
- (2) Persons employed by the attorney of record who are necessary to assist counsel of record in preparation for trial or other proceedings in this case; and
- (3) Persons who defense counsel deems necessary to further legitimate investigation and preparation of this case.

IT IS FURTHER ORDERED that defense counsel shall provide a copy of this Protective Order to any person above who receives copies of discovery.

IT IS FURTHER ORDERED that any person above who receives copies of discovery from defense counsel shall use the discovery only to assist the defense in the investigation and preparation of this case and shall not reproduce or disseminate the discovery material to any other person or entity.

IT IS FURTHER ORDERED that this Protective Order applies only to:

- (1) Statements by witnesses and defendants to government officials;
- (2) Sealed documents; and
- (3) Evidence received from searches of electronic media.

IT IS FURTHER ORDERED that if there is specific discovery material that defense counsel believes should be an exception to this Protective Order, the parties shall confer before seeking guidance from this Court. The parties shall advise the Court by letter of any exceptions made to the Protective Order.

IT IS FURTHER ORDERED that any materials subject to this Protective Order may be filed by a party under seal without prior approval of the Court.

The parties shall continue to confer regarding the efficacy of this Protective Order. Any outstanding issues between the parties related to this Protective Order shall be addressed by the Court at the status conference on June 15, 2016.

Dated this _____ day of March 2016.

THE HONORABLE ANNA J. BROWN
United States District Judge

Presented by:

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon

s/ Craig J. Gabriel

ETHAN D. KNIGHT, OSB #99298
GEOFFREY A. BARROW
CRAIG J. GABRIEL, OSB #01257
Assistant United States Attorneys