

1 DANIEL G. BOGDEN
 United States Attorney
 2 STEVEN W. MYHRE
 NICHOLAS D. DICKINSON
 Assistant United States Attorneys
 3 NADIA J. AHMED
 ERIN M. CREEGAN
 4 Special Assistant United States Attorneys
 333 Las Vegas Blvd. South, Suite 5000
 5 Las Vegas, Nevada 89101
 PHONE: (702) 388-6336
 6 FAX: (702) 388-6698

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> MAR 24 2016 </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
 10 Plaintiff,

11 v.

12 CLIVEN D. BUNDY,
 RYAN C. BUNDY,
 13 AMMON E. BUNDY,
 RYAN W. PAYNE,
 14 PETER T. SANTILLI, Jr.,
 MELVIN D. BUNDY,
 15 DAVID H. BUNDY,
 BRIAN D. CAVALIER,
 16 BLAINE COOPER,
 GERALD A. DELEMUS,
 17 ERIC J. PARKER,
 O. SCOTT DREXLER,
 18 RICHARD R. LOVELIEN,
 STEVEN A. STEWART,
 19 TODD C. ENGEL,
 GREGORY P. BURLESON,
 20 JOSEPH D. O'SHAUGHNESSY,
 MICAH L. McGUIRE, and
 21 JASON D. WOODS,

22 Defendants.
 23
 24

) 2:16-CR-00046-GMN-PAL

) **GOVERNMENT'S MOTION TO
 UNSEAL WRITS AND RELATED
 APPLICATIONS AND MINUTE
 ORDERS**

1 THE UNITED STATES, by and through the undersigned, hereby moves the
2 Court to unseal any and all Writs Habeas Corpus *Ad Prosequendum*, including
3 any related applications and Minute Orders presently sealed at the request of the
4 government in Case Number 2:16-CR-00046-GMN-PAL, located at Docket
5 Numbers 47 through 58. The arrests of all defendants not otherwise detained in
6 other proceedings having been executed, there is no further need for these
7 pleadings to remain under seal as previously requested.

8 **WHEREFORE**, the government respectfully requests that the Court grant
9 its motion and enter an Order unsealing any and all Writs Habeas Corpus *ad*
10 *Prosequendum* and related minutes and applications.

11 A proposed Order is attached for the Court's convenience.

12 DATED this 23rd day of March, 2016.

13
14 Respectfully Submitted,

15
16 DANIEL G. BOGDEN
United States Attorney

17
18 
19 STEVEN W. MYHRE
First Assistant United States Attorney