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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AMMON BUNDY *et al*,

Defendants.

Case No.: 3:16-CR-00051

**DEFENDANT AMMON BUNDY'S
MOTION FOR LEAVE TO FILE
REPLY WITH EXHIBITS *EX
PARTE* UNDER SEAL**

Defendant AMMON BUNDY, by and through his attorneys, and moves the Court for an Order allowing leave to respond and file a motion, attached to this motion as Exhibit A, along with exhibits *ex parte* under seal in reply to Government's Response to Defendant Ammon Bundy's Motion to Modify Protective Order. Those exhibits contain confidential work product that cannot be shared with the Government.

AUSA Craig Gabriel still maintains his opposition to the proposed protective order, but does not oppose Defendant's request to file for leave to file a

**DEFENDANT AMMON BUNDY'S MOTION FOR LEAVE TO FILE
MOTION UNDER SEAL**

proposed motion, nor does he oppose defendant's request to file exhibits *ex parte* under seal.

DATED this 15th day of April, 2016.

/s/ Michael Arnold
Michael Arnold, OSB #011873
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Lissa Casey, OSB #086541
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MOTION UNDER SEAL**

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**UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,

Plaintiff,

vs.

AMMON BUNDY *et al*,

Defendants.

Case No.: 3:16-CR-00051

**DEFENDANT AMMON BUNDY'S
PROPOSED RESPONSE TO
GOVERNMENT'S RESPONSE TO
DEFENDANT AMMON BUNDY'S
MOTION TO MODIFY
PROTECTIVE ORDER**

Defendant Ammon Bundy, by and through his attorneys, respectfully requests the Court impose his proposed protective order.

First, Ryan Bundy joins in the motion. Ammon Bundy does not stand alone in opposing this protective order.

Second, The Government asserts that the proposed protective order is “impractical.” Defendant Ammon Bundy asserts that his proposed protective order is absolutely necessary to provide the representation that the Sixth Amendment requires. Therefore, Mr. Bundy submits the following exhibits as a sample of what

evidence his attorneys have obtained to date using the means of investigation with which the Government disagrees. Just because the Government disagrees with how Mr. Bundy is defending himself, that does not mean that his investigation has been ineffective- the contrary is true.

Mr. Bundy submits these exhibits so that the Court may make an informed decision on whether the Government's protective order infringes upon his right to effectively defend himself against the Government. The Court should be able to consider the fruits of those efforts in determining the impact of the current protective order in this case. Mr. Bundy's investigation, and ultimately his ability to defend himself at trial will be irreparably prejudiced if the Court maintains the current protective order in this case.

DATED this 15th day of April, 2016.

/s/ Michael Arnold

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