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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
UNOPPOSED MOTION TO
EXTEND DEADLINE FOR
MOTION TO DISMISS FOR
LACK OF JURISDICTION**

(Expedited Consideration Requested)

(Government does not Oppose)

Defendant AMMON BUNDY respectfully moves this Court for an order that moves the Motion to Dismiss for Lack of Jurisdiction from the first round of motions to the second round. The reason for this request, more extensively outlined in the attached declaration, incorporated herein by reference, is that this motion will require an evidentiary hearing.

In summary, Defendant Ammon Bundy intends to provide evidence to the Court to prove lack of jurisdiction over the refuge property due to issues with title which are in conflict with the United States Constitution. Given the complexities of the evidence involved, it is not a simple legal argument that can be briefed and

expedited for the Court. Evidence must be taken, and witnesses will likely need to be called.

DATED this 22nd day of April, 2016.

/s/ Lissa Casey
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