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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:16-CR-00125-BR**

**v.**

**MOTION FOR ORDER  
ALLOWING ACCESS TO  
DISCOVERY**

**SCOTT ALAN WILLINGHAM,**

**Defendant.**

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and through Ethan D. Knight, Geoffrey A. Barrow, and Craig J. Gabriel, Assistant United States Attorneys, hereby moves this Court for an order allowing counsel for defendant Willingham access to all discovery provided by the government to defendants in related case *United States v. Ammon Bundy, et al.*, District of Oregon Case No. 16-CR-00051-BR. Defense counsel for defendant Willingham has been provided with a copy of the Protective

Order (ECF No. 342, attached hereto as Exhibit 1) issued in the *Bundy* matter and agrees to abide by the terms of that Order. Counsel for defendant Willingham also agrees that the Protective Order in Case No. 16-CR-00051-BR will apply to any discovery produced in this case.

Defendant, through his counsel, Richard Fredericks, concurs with this motion.

Dated this 25th day of April 2016.

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

*s/ Craig J. Gabriel*

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ETHAN D. KNIGHT, OSB #992984

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Assistant United States Attorneys

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:16-CR-00051-BR**

**v.**

**AMMON BUNDY, et al.,**

**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.

**Exhibit 1**

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 24th day of March 2016.

s/ Anna J. Brown  
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  
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