

1 DANIEL G. BOGDEN
United States Attorney
2 STEVEN W. MYHRE
NICHOLAS D. DICKINSON
3 Assistant United States Attorneys
NADIA J. AHMED
ERIN M. CREEGAN
4 Special Assistant United States Attorneys
501 Las Vegas Blvd. South, Suite 1100
5 Las Vegas, Nevada 89101
PHONE: (702) 388-6336
6 FAX: (702) 388-6698

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

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 v.)

12 AMMON E. BUNDY,)

13 Defendants.)

2:16-CR-00046-GMN-PAL

**GOVERNMENT'S RESPONSE IN
OPPOSITION TO DEFENDANT
AMMON E. BUNDY'S JOINDER
TO PAYNE'S MOTION TO
DISMISS (C.R. 300)**

14
15 **CERTIFICATION:** Pursuant to Local Rule 12-1, this Response is timely filed.

16 The United States, by and through the undersigned, respectfully submits
17 its Response in Opposition to Defendant Ammon E. Bundy's ("Bundy's") Joinder
18 To Payne's Motion to Dismiss (C.R. 291).

19 Bundy's pleading fails to provide any points and authorities in support of
20 joinder and should, therefore, be denied. LCR 47-3 ("The failure of a moving party
21 to include points and authorities in support of the motion constitutes a consent to
22 denying the motion.") Further, in the absence of any points and authorities, it is
23 impossible for the government to respond to the joinder, being unable to discern
24 either the basis for Bundy's joinder or the relief he seeks.

1 To the extent the Court deems a Response to be warranted, the government
2 submits, and incorporates by reference in its entirety, its Response in Opposition
3 to Payne's Motion to Dismiss (C.R. 383) and respectfully requests that any joinder
4 or other relief sought by Bundy be denied for all the reasons set forth therein.

5 **WHEREFORE**, for all the foregoing reasons, the government respectfully
6 requests that the Court enter an Order denying Bundy's joinder of Payne's Motion
7 to Dismiss.

8 DATED this 9th day of May, 2016.

9
10 Respectfully submitted,

11 DANIEL G. BOGDEN
12 United States Attorney

13 *//s//*

14 _____
15 STEVEN W. MYHRE
16 NICHOLAS D. DICKINSON
17 Assistant United States Attorneys
18 NADIA J. AHMED
19 ERIN M. CREEGAN
20 Special Assistant United States Attorneys

21 Attorneys for the United States
22
23
24

CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing GOVERNMENT'S RESPONSE IN OPPOSITION TO DEFENDANT AMMON E. BUNDY'S JOINDER TO PAYNE'S MOTION TO DISMISS (C.R. 300) upon counsel of record via Electronic Case Filing (ECF).

Dated this 9th day of May, 2016.

/s/ Steven W. Myhre

STEVEN W. MYHRE
Assistant United States Attorney

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24