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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

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

**v.**

**AMMON BUNDY, et al.**

**JOINT STATUS REPORT  
REGARDING DISCOVERY**

**Defendants.**

Pursuant to the Court's April 11, 2016, Order (ECF No. 389) and its April 15, 2016, Order (ECF No. 422), attorneys for the government have conferred with the Defendants' Discovery Committee. The parties offer the following:

**A. Joint Statement Regarding Status of Discovery**

On Monday, May 9, 2016, the government produced Volumes 16 through 23. These materials included photographs, aerial surveillance videos, copies of evidence, and reports. It was approximately 492 GB of data in 169,041 files and included 4319 Bates pages. The government is continuing to produce discovery and anticipates that the next discovery production

will be released this Friday. These materials will include approximately 300 GB of data comprised of copies of evidence, reports, and other materials.

**B. Defendant Santilli's Exception to the Joint Status Report**

**1. Statement from Mr. Coan:**

Discovery records show the government has more than a thousand hours of pole camera video recordings. Tom Coan has requested the government produce any index or time stamped footage or reports or other records indicating when any of the defendants can be seen in the videos, but the government hasn't responded. Defendants request this information to avoid duplicating work unnecessarily.

**2. Government's Response:**

On Sunday, May 8, 2016, at 5:08 p.m., Mr. Coan submitted a request via e-mail for a particular surveillance video, information regarding whether the video included a time and date stamp, and whether the government had a log or report documenting the comings and goings of individuals depicted in the video. Earlier today, the government informed Mr. Coan that the video he sought had been produced in discovery on May 2, 2016, and that it did include a time/date stamp. The government also reported that it was not aware of any log documenting the information that Mr. Coan requested.

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The government has not yet heard from Mr. Coan regarding any outstanding issues surrounding his request.

Dated this 11th day of May 2016.

Respectfully submitted,

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s/ Geoffrey A. Barrow  
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