

CASE NO. 16-72275

IN THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

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In Re: CLIVEN D. BUNDY, *Petitioner*

v.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA  
Lloyd D. George U.S. Courthouse  
333 S. Las Vegas Boulevard South  
Las Vegas, Nevada 89101

*Respondent*

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From the United States District Court For the District of Nevada  
The Honorable Gloria Navarro, Presiding  
Case No. 2:16-CR-00046-GMN-PAL-1

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**EMERGENCY MOTION OR ALTERNATIVE URGENT MOTION  
TO EXPEDITE PETITION FOR WRIT OF MANDAMUS**

ORAL ARGUMENT REQUESTED

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July 7, 2016

**Circuit Rule 27-3 Certificate**

"Emergency" Motion or "Urgent" Motion

Pursuant to Local Circuit Rule No. 27-3, Petitioner hereby certifies:

- 1) The telephone numbers, e-mail addresses, and office addresses of the attorneys for the parties are:**

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2) **Facts showing the existence and nature of the claimed emergency.**

The Petitioner Cliven D. Bundy, Defendant in the trial court below, needs immediately to have in place his chosen legal team for his criminal defense, including out-of-state former federal prosecutor and federal criminal defense lawyer Larry Klayman, by is appearing *pro hac vice* in this case. Respectfully, Bundy's Sixth Amendment right to counsel cannot be postponed or delayed. If the prosecution continues without Bundy immediately having a complete criminal defense team for legal defense,

Petitioner could be deprived of adequate assistance of counsel and convicted and sentenced to life imprisonment without his having due process of law and the constitutional right to counsel of his choice.

Petitioner Bundy was arrested on February 11, 2016, on 17 counts of alleged criminal conduct concerning a political protest arranged by others. Bundy is even now being prosecuted in the U.S. District Court for the District of Nevada ("District Court"), in Criminal Action No. 2:16-CR-00046-GMN-PAL-1.

The trial has been scheduled for February 2017. With bond denied, Petitioner will likely spend one solid year in jail awaiting trial. Petitioner Bundy has already been denied his right to a speedy trial, an important legal event, as the government successfully argued, without Mr. Klayman being able to defend Petitioner, that this is a complex case, based on the number of defendants and the huge amount of pre-trial discovery that needs to be turned over to Defendants and then analyzed. Once this is done, Petitioner Bundy will need to prepare and file pre-trial motions, including a motion to dismiss the indictment. Since Mr. Klayman is the only member of the trial team with prior federal criminal defense experience, notwithstanding his experience as a prosecutor for the U.S. Department of Justice, he needs to play a central role in reviewing the discovery, preparing motions and orally



arguing these motions in court. All of these events and matters require Petitioner Bundy having his chosen legal defense team in place, of which Mr. Klayman is the principal defense lawyer. These events and matters are happening now, not just in the future.

Therefore, it cannot be denied that Petitioner Bundy has a compelling need for his full legal team at this time. This would necessarily include Mr. Klayman as the lead and principal federal criminal defense counsel.

**3) When and how counsel for the other parties were notified and whether they have been served with the motion.**

We notified a motions attorney in the Motions Unit of the the Clerk of the Court by telephone at about 10:00 AM on July 7, 2016, Pacific Standard Time of the Petitioner's intent to file this emergency motion.

All counsel who have entered an appearance on the District Court's ECF / PACER system were notified by email on July 6, 2016, as set forth in the Certificate of Service below. They have all received a copy of the Petition for Writ of Mandamus by email. They will be served with this motion at the same time that it is filed with this Court's ECF system. That is, counsel for all interested parties will receive this motion as soon as it is finalized, which is when it is being filed. However, the Office of the U.S. Attorney for the District of Nevada would respectfully declined to provide an email address and instead kindly directed that the Petition and this motion

be sent by U.S. mail.

Local Rule of the U.S. Court of Appeals for the Ninth Circuit Rule 27-3 requires that (emphasis added):

**(a) Emergency Motions**

If a movant certifies that to avoid irreparable harm relief is needed in less than 21 days, the motion shall be governed by the following requirements:

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**(3)** Any motion under this Rule shall have a cover page bearing the legend “Emergency Motion Under Circuit Rule 27-3” and the caption of the case. A certificate of counsel for the movant, entitled “Circuit Rule 27-3 Certificate,” shall follow the cover page and shall contain:

**(i)** The telephone numbers, e-mail addresses, and office addresses of the attorneys for the parties; (*Rev. 12/1/09*)

**(ii)** Facts showing the existence and nature of the claimed emergency; and

**(iii)** *When and how counsel for the other parties were notified and whether they have been served with the motion; or, if not notified and served, why that was not done.*

In this case, the undersigned counsel's staff inquired of the Clerk of the Court whether or not in a case like this, where 19 different cases against 19 different Defendants have been consolidated, the notice required to be sent must include counsel for all 18 other Defendants. Two different assistant clerks in the Clerk's office conferred and determined that all of the 18 other Defendants in the case must be notified and served by ECF in the Certificate of Service.

**4) Were all grounds advanced in this Court in support of Petitioner's emergency motion submitted to the District Court.**

All grounds were presented to the District Court, and the Petitioner is requesting that the Court order that the Petitioner's April 12, 2016, application for entry of his chosen out-of-state attorney Larry Klayman filed with the District Court be ordered granted notwithstanding the District Court's April 19, 2016, order denying the same, without prejudice. No prejudice will result to any party by having Mr. Klayman appear as Petitioner's counsel pro hac vice, but important constitutional and other rights of Mr. Bundy will likely be lost or compromised severely if Mr. Klayman's application is not granted on an expedited basis.

Importantly, the government had not filed any pleading below which opposed Mr. Klayman's pro hac vice application, as ironically it likely recognized that to deny Petitioner Bundy right of counsel of his choosing

**MOTION AND INCORPORATED MEMORANDUM OF LAW**

**I. INTRODUCTION**

Pursuant to Circuit Rule 27-12, Petitioner Cliven D. Bundy requests for this honorable Court to expedite the briefing schedule for this petition previously filed.

The Petitioner previously filed in the U.S. Court of Appeals for the Ninth Circuit (“Ninth Circuit”) an emergency petition for writ of mandamus for the entry of his attorney *pro hac vice* in the proceedings in the U.S. District Court for the District of Nevada ("District Court") below.

**II. TIMING REQUIREMENTS AND DEADLINES FOR EMERGENCY OR URGENT TREATMENT**

The Petitioner requests either "emergency" treatment for resolution and relief within 21 days or if that is denied by this Court in the alternative treatment as an "urgent" motion to expedite the appeal within weeks as quickly as possible.

This is a matter of extreme urgency as criminal prosecution is on-going. This is also a simple matter which can be successfully handled in a very brief time, both in terms of time on the calendar and a minimal amount of time expended on the case. The Petition presents essentially one legal question to resolve.

There is not a specific court date scheduled and docketed occurring within 21 days, but the undersigned lawyers for the Petitioner Cliven Bundy need to *file* and *initiate* pleadings and motions immediately within 21 days.

Larry Klayman has federal criminal experience and needs to immediately file and argue motions to preserve the Petitioner's legal rights. Likewise, preserving objections and issues for appeal requires involvement of a full legal team immediately, without delay. Mr. Klayman is a former federal prosecutor and is a federal criminal defense lawyer among other areas of expertise. Local counsel Joel Hansen has little federal criminal defense experience and thus he and Defendant Bundy require Mr. Klayman as co-counsel.

### **III. STATEMENT OF THE CASE AND PROCEDURAL BACKGROUND**

The Petitioner Cliven D. Bundy, Defendant in the trial court below, was arrested on February 11, 2016 on 17 counts of alleged criminal conduct. Bundy has pled not guilty and seeks the dismissal of all charges. If convicted, Bundy faces the potential for life imprisonment.

Four of Defendant Bundy's sons are among these Defendants and they are currently in prison as well awaiting trial. The Bundy ranch is thus being held down by Defendant Bundy's wife and some of his daughters as the men are all in prison. The family is nearly bankrupt because of these circumstances.

However, the District Court denied without prejudice two applications *pro hac vice* for Mr. Klayman's entry into the case as co-counsel.

Petitioner Bundy, Defendant below, risks life imprisonment in a criminal prosecution. Time is ticking for Defendant Bundy to have a defense team in place.

Defendant Bundy deserves his Sixth Amendment right of counsel. He has chosen Mr. Klayman to be on his defense team with local counsel Joel Hansen, as one lawyer cannot handle the entire defense of Cliven Bundy on his own in a designated complex case.

#### **IV. ARGUMENT**

As set forth in our Petition for writ of mandamus, the law provides the Petitioner Cliven Bundy with the right to have his attorney admitted pro hac vice. Local counsel does not have as his forte federal criminal defense experience. For the reasons stated in the petition, Cliven Bundy needs Mr. Klayman to appear as counsel immediately because his rights could be lost. The Petitioner's attorney needs to participate in discovery and needs to participate in motions and hearings. Legal decisions are already being made which the Petitioner's full legal team should participate in, including designation as a complex case and suspension of the right to a speedy trial. Issues and motions that could be raised on Bundy's behalf require his full, chosen criminal defense team to be on the case. There are motions that need to be attended to and Hansen is not a federal criminal defense attorney.

The petition needs to be expeditiously decided because time is ticking and the case is moving to trial. The government claims that the case is complex. If so, it is imperative that Cliven Bundy have a complete legal defense team in place to

represent his interests and protect his rights.

The Petitioner has a right to counsel under the Sixth Amendment to the U.S. Constitution. Therefore, this honorable Court is respectfully requested to issue a ruling immediately, so that Petitioner's counsel Larry Klayman can defend his client as legal counsel experienced in federal criminal law and practice.

“[A] decision denying a pro hac vice admission necessarily implicates constitutional concerns.” *Panzardi-Alvarez v. United States*, 879 F.2d 975, 980 (1st Cir.1989). The right to retain particular counsel of his own choosing stems from a defendant's right to decide what kind of case he wishes to present in his defense. *U.S. v. Nichols*, 841 F.2d 1485, 1502 (10th Cir.1988).

A criminal defendant's Sixth Amendment rights encompass the right to be represented by the attorney the defendant chooses. *Wheat v. United States*, 486 U.S. 153, 159, 100 L. Ed. 2d 140, 108 S. Ct. 1692 (1988); *Powell v. Alabama*, 287 U.S. 45, 53, 77 L. Ed. 158, 53 S. Ct. 55 (1932). “It is hardly necessary to say that, the right to counsel being conceded, a defendant should be afforded a fair opportunity to secure counsel of his own choice.” *Powell*, 287 U.S. at 53.

As this Court has noted in the course of its analyses of related issues:

Finally, that Cohan isn't a member of the Oregon bar was not an adequate reason to deny substitution. A defendant's right to the counsel of his choice includes the right to have an out-of-state lawyer admitted pro hac vice. *Collins*, 920 F.2d at 626.

*United States v. Lillie*, 989 F.2d 1054, 1056 (9th Cir. 1993) (citation omitted), overruled on other grounds by *United States v. Garrett*, 179 F.3d 1143 (9th Cir.1999).

*United States v. Collins*, 920 F.2d 619, 626 (10th Cir.1990), cert. denied, 500 U.S. 920, 111 S.Ct. 2022, 114 L.Ed.2d 108 (1991), it is confirmed that:

Before reaching the merits of defendant's sixth amendment claim, we address the effect of Dickstein's pro hac vice admission. Although the admission of attorneys pro hac vice is committed to the discretion of the district courts, denial of admission pro hac vice in criminal cases ***implicates the constitutional right to counsel of choice***. *Panzardi-Alvarez v. United States*, 879 F.2d 975, 980 (1st Cir.1989), cert. denied, --- U.S. ---, 110 S.Ct. 1140, 107 L.Ed.2d 1045 (1990); *Fuller*, 868 F.2d at 607; *Panzardi Alvarez*, 816 F.2d at 816.

*Id.* at 626 (emphasis added).

## V. CONCLUSION

Wherefore, the Petitioner requests treatment of this motion to expedite as an emergency matter for resolution within 21 days. If that request is denied, the Petitioner asks in the alternative for treatment as an "urgent" matter for resolution and relief within weeks, as soon as possible.

In summary, Petitioner Cliven Bundy requests that this Court order that Petitioner's counsel Larry Klayman be admitted *pro hac vice* at the earliest practicable date to protect his rights to a full and complete defense, as if convicted he faces life imprisonment.



Dated: July 7, 2016

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2016, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. Court of Appeals for the Ninth Circuit by using the Ninth Circuit's CM/ECF system, causing it to be served upon the following counsel of record in the case through CM/ECF. A copy was also sent by email to all of the following, except that the U.S. Attorney's office refused to provide an email address and a copy will be mailed on July 8, 2016, when the U.S. Post Office opens for the morning for business.

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