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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,

CR No. 3:16-cr-00061-MO

Plaintiff,

DEFENDANT'S MOTION TO  
COMPEL NOTICE OF  
SURVEILLANCE AND FOR  
PRODUCTION OF RELATED  
DISCOVERY

v.

JOSEPH O'SHAUGHNESSY,

Defendant.

*ORAL ARGUMENT REQUESTED*

The defendant, Joseph O'Shaughnessy, through counsel, moves the government for notice of surveillance and for production of discovery related to surveillance in accordance with Federal Rule of Criminal Procedure 16, 18 U.S.C. § 3504, and the United States Constitution, amend. IV, V & VI. This motion relies on the argument and authorities set forth in the accompanying Memorandum In Support, filed herewith.

**Statement Of Conferral**

The defense has conferred with the government regarding the contents of this motion.

On May 11, 2016, I received a letter stating that the government opposes the motion.

Respectfully submitted on May 11, 2016.

/s/ Amy Baggio  
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Attorney for Defendant O'Shaughnessy