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

UNITED STATES OF AMERICA,	)	Case No. 3:16-CR-00051-BR-09
	)	
Plaintiff,	)	
	)	DEFENDANT'S MOTION TO COMPEL
vs.	)	PRODUCTION OF INFORMATION
	)	PERTAINING TO DEFENDANTS AND
JASON PATRICK,	)	WITNESSES CONTAINED WITHIN
	)	VARIOUS LAW ENFORCEMENT
Defendant	)	DATABASES
	)	
	)	

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Standby Counsel Mr. Kohlmetz has conferred on my behalf with AUSA Geoffrey Barrow on this Motion. The parties may be able to resolve some or all of the issues herein before the Government's Response to this Motion is due. The Court will be alerted to any progress in this regard in timely fashion.

COMES NOW Defendant, Jason Patrick, and hereby moves the Court pursuant to FRCP16(a)(1)(E), and/or under the principles announced in *Brady v. Maryland*, 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215 (1963), for an Order compelling the government to disclose, produce, and make available for examination and copying the following items or information,

DEFENDANT'S MOTION TO COMPEL

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whether currently in the possession, custody or control of the government, or which, by the exercise of due diligence, may become known to the government:

From the following databases, the results of name queries for the defendants herein, any unindicted co-conspirators, any government witnesses, and any government sources of information pertinent to this case or defendants herein. The referenced databases are:

- a. SENTINEL
- b. Guardian and or eGuardian
- b. DIVS
- c. ORION
- d. NGI-IPS
- e. NCIC

This Motion is supported by the concurrently filed Memorandum in Support thereof.

RESPECTFULLY SUBMITTED This 29<sup>th</sup> day of June, 2016.

Jason Patrick

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Jason Patrick, Pro Se