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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,) CASE NO. 2:16-cr-00046-GMN-PAL
)
10 Plaintiff,)
)
11 vs.)
)
12 CLIVEN D. BUNDY, et al,)
)
13 Defendants)

14 **SECOND SUPPLEMENT TO PRO HAC VICE RE PETITIONER'S AND APPLICANT'S**
15 **COMPLIANCE WITH COURT ORDER OF APRIL 2, 2016 AND SUPPLEMENT TO AND**
16 **RENEWED VERIFIED PETITION FOR PERMISSION TO PRACTICE IN THIS CASE ONLY BY**
17 **ATTORNEY NOT ADMITTED TO THE BAR OF THIS COURT AND DESIGNATION OF**
18 **LOCAL COUNSEL PREVIOUSLY FILED ON MARCH 22, 2016**

19 The undersigned counsel hereby again supplements Pro Hac Vice application of Attorney Larry
20 Klayman with the resume of renowned expert ethics Professor Ronald Rotunda, which was
21 inadvertently left off the prior filing. The prior filing stated that the expert report of Dr. Rotunda was
22 being submitted as an attachment to Exhibit 2, which was Dr. Rotunda's expert opinion that Mr.
23 Klayman had not committed any ethical violation before the District of Columbia Board of
24 Professional Responsibility. This proceeding is still pending. In addition, the prior filing contains a
25 written brief as Exhibit 1 to that filing, referencing Dr. Rotunda's sworn testimony in which he also
26 opined that Mr. Klayman had committed no ethical violation. The resume which is being submitted
27 herewith underscores Dr. Rotunda's impressive qualifications to render this expert opinion.
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1 Further, the undersigned counsel is attaching a recent Las Vegas Review Journal report of April
2 8, 2016, which raises significant concerns. See Exhibit 3. It shows that Senate Minority leader Harry
3 Reid, through his nationally televised statements on the Senate floor, is seeking to prejudice this
4 criminal proceeding by branding my client Cliven Bundy, and his family, domestic terrorists, and, by
5 implication, that they should spend the rest of their lives in federal prison. In this regard, Cliven Bundy
6 is now in solitary confinement and has been denied bail pending appeal to this Court. Senator Reid, on
7 the Senate floor, proclaimed that "Cliven Bundy is where he should be—in jail." Further, Senator Reid
8 called Cliven Bundy an "outrageous lawbreaker."
9

10 As it has been reported that Senator Harry Reid recommended this Court's appointment to the
11 bench to President Obama, and because President Obama has previously attacked and mocked Cliven
12 Bundy in a nationally televised White House Correspondents' Dinner, see
13 <https://www.youtube.com/watch?v=rveNp7f57H>, undersigned Counsel, with complete respect to this
14 Court, requests that the Court address these concerns at an appropriate time.
15

16 DATED this 12th day of April, 2016.

17 Respectfully submitted,

18 BY: /s/ Joel F. Hansen
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5 (b), I hereby certify that on this 12th day of April, 2016, I served a copy of the foregoing SECOND SUPPLEMENT TO PRO HAC VICE RE PETITIONER’S AND APPLICANT’S COMPLIANCE WITH COURT ORDER OF APRIL 2, 2016 AND SUPPLEMENT TO AND RENEWED VERIFIED PETITION FOR PERMISSION TO PRACTICE IN THIS CASE ONLY BY ATTORNEY NOT ADMITTED TO THE BAR OF THIS COURT AND DESIGNATION OF LOCAL COUNSEL PREVIOUSLY FILED ON MARCH 22, 2016 as follows:

- X Electronic Service - via the Court’s electronic service system; and/or
- U.S. Mail – By depositing a true copy thereof in the U.S. mail, first class postage prepaid and addressed as listed below; and/or
- Facsimile – By facsimile transmission pursuant to EDCR 7.26 to the facsimile number(s) shown below and in the confirmation sheet filed herewith. Consent to service under NRCP 5(b)(2)(D) shall be assumed unless an objection to service by facsimile transmission is made in writing and sent to the sender via facsimile within 24 hours of receipt of this Certificate of Service; and/or
- Hand Delivery – By hand - delivery to the address listed below.

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