

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Complainant,

v.

KELLY MEGGS

*(Styled as USA v. Thomas Edward Caldwell
incorporating cases against multiple Defendants)*

Defendant

Criminal Case No.

1:21-cr-28-8-APM

Assigned to the Honorable
Amit Mehta, District
Court Judge

**KELLY MEGGS' MOTION TO REMOVE THE SENSITIVE
DESIGNATION OF CERTAIN VIDEO**

COMES NOW the Accused, Mr. Kelly Meggs, by counsel, pursuant to Paragraph 9 of the Protective Order and hereby respectfully moves the Court for an order directing the Government to remove sensitivity designations to publicly release one or more video(s) produced under a Protective Order. The video(s) in question are described as the “West Terrace 3 Hour Block” video attached as Exhibit 13 in EXHIBIT A, attached, **Defendant Ryan Nichols’ Motion For Modification Of Bail To Place Defendant On Conditional Release Pending Trial, USA v. Ryan Taylor Nichols**, Case No. 21-cr-00117-TFH-1, within this Court, ECF Dkt. # 55, November 1, 2021, and also EXHIBIT B, attached, Andrea Widburg, “**Did Capitol Police murder someone other than Ashli Babbitt?**,” American Thinker, November 22, 2021, accessible at

[https://www.americanthinker.com/blog/2021/11/did_capitol_police_murder_someone_othe
r_than_ashli_babbitt_.html](https://www.americanthinker.com/blog/2021/11/did_capitol_police_murder_someone_other_than_ashli_babbitt_.html) (mis-identifying the motion as a motion to dismiss), and EXHIBIT C, attached Julie Kelly, “**Terror in the Capitol Tunnel,**” American Greatness, November 18,

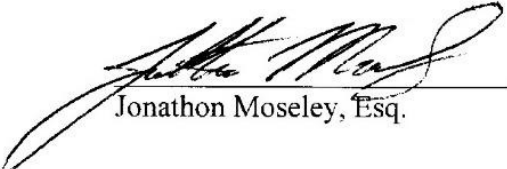
2021, accessible at: <https://amgreatness.com/2021/11/18/terror-in-the-capitol-tunnel/>

CONCLUSION

WHEREFORE, the Court should order the designation of videos from within the compilation of the Ryan Nichols' defense counsel removed and the video publicly released.

CERTIFICATION OF CONSULTATION

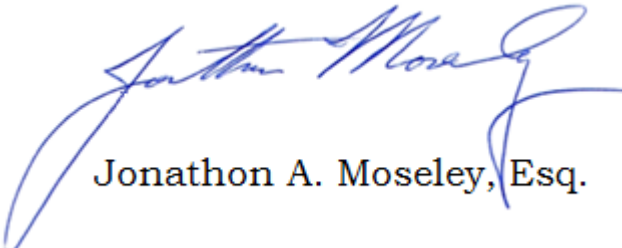
I hereby certify that – even though the matter has been before the Government in *USA v. Ryan Nichols* since November 1, 2021, I sent a copy of the Memorandum of Law to the counsel in both *USA v. Caldwell* and *USA v. Ryan Nichols* this morning on November 23, 2021.



Jonathon Moseley, Esq.

Dated: November 23, 2021

RESPECTFULLY SUBMITTED
KELLY MEGGS, *By Counsel*



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CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2021, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following CM/ECF participants. From my review of the PACER / ECF docket records for this case that the following attorneys will receive notice through the ECF system of the U.S. District Court for the District of Columbia.

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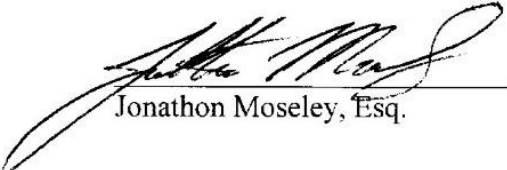
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