

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

Complainant,

v.

KELLY MEGGS

and

KENNETH HARRELSON

*(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

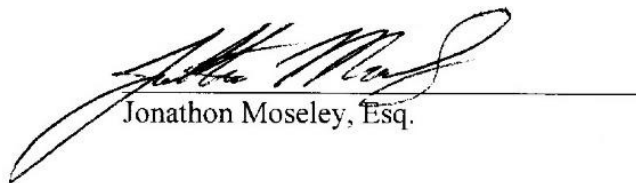
KELLY MEGGS AND KENNETH HARRELSON
REQUEST FOR SCHEDULING HEARING, ARGUMENT, AND DECISION ON
MOTION TO REMOVE THE SENSITIVE DESIGNATION OF CERTAIN VIDEO

COMES NOW the Defendants Mr. Kelly Meggs and Mr. Kenneth Harrelson, by counsel, pursuant to Paragraph 9 of the Protective Order and hereby respectfully move 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_oth_er_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/>

REQUEST FOR ORAL ARGUMENT

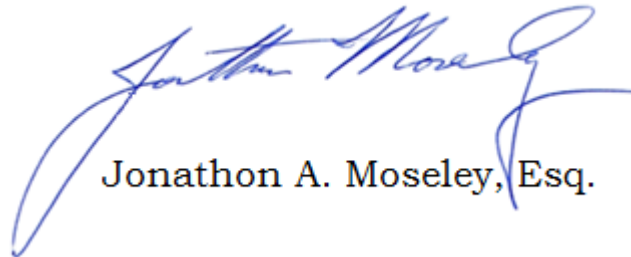
Defendant Kelly Meggs, by counsel, requests oral argument upon the motion.



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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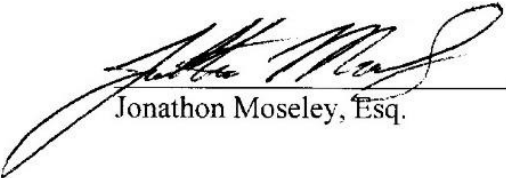
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