

<p>UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS</p> <p>UNITED STATES OF AMERICA</p> <p>v.</p> <p>BARRETT LANCASTER BROWN</p> <hr/> <p>Attorney for Intervenor: Jason Flores-Williams, Esq. 624 Galisteo #10 Santa Fe, NM 87505 Telephone: 505-467-8288 Email: JFW@JFWLAW.NET Bar No. 132611</p>	<p>▲ COURT USE ONLY ▲</p> <hr/> <p>Case Number: 3:12-CR-317-L</p> <p>Hon. Judge Lindsay</p>
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MOTION FOR LEAVE TO REPLY

COMES NOW Sebastiaan Provost, by and through counsel, pursuant to LCrR 47.1(f), respectfully moves this Honorable Court for leave to reply on the following grounds:

1. The government impliedly asks *what is a journalist today?* Mr. Provost prays this Honorable Court allow him to address this critical First Amendment issue central to the just determination of his motion.
2. The government attempts to dismiss *pro bono* civil rights litigation as an attempt to obtain publicity. This is a time-tested way of demeaning the constitutional concerns of the less powerful.¹ Mr. Provost requests that he be able to reply to this mischaracterization of his legal position.
3. The government uses content from experienced civil rights attorney Jay Leiderman's personal business website in its exhibits. Along with sending a message that attorneys risk *ad hominem* attack for the duty-bound advocacy of our constitution, these exhibits contravene the rules of hearsay and authentication should this Honorable Court choose to apply the Federal Rules of Evidence to the adjudication of this motion. See. *F.R.E 801, 901*.

¹ Also contrary to the aspirations of our legal ethics which speak to the duty of taking on challenging cases *pro bono*. See ABA Model Rule 6.1
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For the above-referenced grounds, Mr. Provost respectfully moves this Honorable Court for leave to reply pursuant to LCrR 47.1(f).

Respectfully submitted,

s/Jason Flores-Williams

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(P)ROPOSED ORDER FOR MOTION FOR LEAVE TO REPLY

Mr. Provost's Motion For Leave To Reply is GRANTED _____

Respectfully submitted,

s/ Jason Flores-Williams

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Hon. Sam A Lindsay
Federal Court Judge

WBDL: Motion For Leave To Reply

CERTIFICATE OF SERVICE

I certify that on 4/14/13, I caused a copy of the foregoing pleading to be delivered via electronic filing to the Honorable Sam. A. Lindsay, United States District Judge; and Ms. Candina S. Heath, Assistant United States Attorney; and Mr. Doug Morris , Assistant Federal Public Defender; and via fax to interested party CloudFlare, Inc.

s/ Jason Flores-Williams

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