



1 Ryan C. Bundy
ID No. 79400-065
2 Nevada Southern Detention Hearing
2190 Ease Mesquite Avenue
3 Pahrump, Nevada 89060
Pro Se

4 UNITED STATES DISTRICT COURT
5 FOR THE DISTRICT OF NEVADA
6 SOUTHERN DIVISION

7 RYAN C. BUNDY,
8 Plaintiff,

9 Vs

10 UNITED STATES OF AMERICA, INC.,
11 Serve: U.S. Attorney's Office
501 Las Vegas Boulevard South
12 Suite 1100
Las Vegas, NV 89101

2:17-cv-01127-JAD-GWF

13 CORECIVIC,
14 Serve: Address

15 CHARLOTTE COLLINS,
16 Serve: Address

17 JOHN AND JANE DOES 1 THROUGH 15
18 Serve: Address

19 Defendants,.

20 **PLAINTIFF'S MOTION TO ALLOW CM/ECF**

21 **FILING CAPABILITY**

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23 **COMES NOW**, the Pro per Plaintiff, Ryan C. Bundy (hereinafter "Bundy" or "Plaintiff")
24 and moves this Court to enable CM/ECF filing access and states the following:
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27 1. Plaintiff Bundy, at all times relevant hereto, is currently being detained at the Nevada
28 Southern Detention Center; and,

- 1 2. At all times relevant hereto, the Nevada Southern Detention Center is owned and
2 operated by CoreCIVIC, a publicly owned and operated prison and detention center;
3 and,
- 4 3. Plaintiff Bundy, at all times relevant hereto, is a Pro per Plaintiff; and,
- 5 4. Plaintiff Bundy has been, and continues to be at a severe disadvantage in representing
6 himself, while being detained at the Nevada Southern Detention Center; and,
- 7 5. Plaintiff Bundy has been and continues to experience extreme delay in filing documents
8 through the facilities of CoreCIVIC. In fact, Plaintiff Bundy has been prejudiced by
9 Magistrate Judge Peggy Leens' numerous rulings to strike Plaintiff's pleadings because
10 they were perceived as filed late due to no fault of his own, and over his explanation that
11 he was not in control of the logistics thereof; (See Case No. 2:16-cv-00046); and,
- 12 6. Plaintiff Bundy, on numerous occasions, has requested that as a pre-trial detainee, he be
13 given CM/ECF filing capabilities to manage and file his own legal work product therein;
14 and,
- 15 7. Plaintiff Bundy respectfully requests leave of this Court to designate Amy Roach and
16 Rand Cadmus, both of whom have extensive CM/ECF filing experience as
17 Paralegals/Legal Assistants throughout numerous Federal Circuits and District Courts in
18 the United States; and,
- 19 8. Plaintiff Bundy avers that this will mitigate his present disability in managing his legal
20 matters; filings, and otherwise monitoring the contents of his docket for purposes of
21 obtaining relief as his averments have alleged in the respective motions and other papers
22 filed herewith; and,
- 23 9. Plaintiff Bundy respectfully requests that this Court order NSDC to open up CM/ECF
24 filing access for Plaintiff; or otherwise:
- 25 10. Plaintiff Bundy respectfully requests that the Court set up Plaintiff's access using
26 randcadmus@gmail.com; and/or jaminwithamy@gmail.com; and,
- 27 11. Plaintiff Bundy intends to and will gladly designate Cadmus and Roach as his
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designated filers in his civil matters, on notice by the Court to do so.

WHEREFORE, Plaintiff respectfully requests that this Court **GRANT** his motion to electronically file his pleadings and legal papers personally while detained at NSDC or through the assistance of the aforementioned non lawyer assistants; and any and all further relief this Court deems proper and just.

RESPECTFULLY SUBMITTED,



Bundy, Ryan C

Pro Se **PLAINTIFF**