

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:25MJ320-DCK

UNITED STATES OF AMERICA)	
)	
v.)	<u>GOVERNMENT’S RESPONSE TO</u>
)	<u>MOTION FOR DISCOVERY</u>
)	<u>AND ORDER TO REQUEST AND</u>
)	<u>PRODUCE <i>BRADY</i> MATERIAL</u>
WILLIAM STANLEY)	
HEATHER MORROW)	
_____)	

The United States of America, by and through United States Attorney Russ Ferguson, responds to the defendants’ Motion for Discovery and Order to Request and Produce *Brady* Material. In support of its response, the government respectfully asserts:

1. Pursuant to this District’s Standard Discovery Order, the United States intends to fulfill its discovery obligations, and it will request and produce *Brady* material as required by applicable law. The government provided case discovery to the defendants on December 23, 2025, and it is aware that its discovery obligations are ongoing.

2. This Office has contacted the agency for whom the Deportation Officers work, and it requested that their electronic communications and other material evidence be preserved so that they can be produced if necessary. Upon information and belief, notifications to preserve such evidence has been sent to the officers and no evidence has been deleted or destroyed.

3. In addition to discovery already produced, the government has contacted Immigration and Customs Enforcement/Enforcement and Removal Operations (ICE/ERO) personnel about obtaining surveillance camera footage that allegedly shows the defendants and other persons arriving at and walking around grounds of the ICE/ERO building before they

encountered the Deportation Officers on November 16, 2025. To date, the government has not successfully obtained this footage.

RESPECTFULLY SUBMITTED this the 6th day of January 2026.

DALLAS J. E. KAPLAN
ATTORNEY FOR THE UNITED STATES
PURSUANT TO 28 U.S.C. § 515

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