

Jan. 3, 2018
Kicker MurphyCLERK SUPERIOR COURT
PAULDING COUNTY, GEORGIAIN THE SUPERIOR COURT OF PAULDING COUNTY
STATE OF GEORGIASTANDING ORDER REGARDING PRETRIAL MOTIONS AND DISCOVERY
REQUESTS IN ALL CRIMINAL CASES

It appears that defense counsel will file the following notices and motions (hereinafter referred to as Exhibits 1-21) in connection with all criminal cases pursuant to their obligations concerning such representation:

1. Notice of Defendant's Election to Proceed under O.C.G.A. § 17-16-1, et seq. or under O.C.G.A. § 17-16-20, et seq.;
2. Motion for Discovery of Statements of the Defendant;
3. Motion to Obtain Discovery of Statements Made by Witness for the State;
4. Defendant's Request for Information Described in O.C.G.A. § 17-16-8;
5. Demand for the Production of the Accused's Criminal History pursuant to O.C.G.A. § 17-16-4(a)(2);
6. Demand for Inspection, Analysis, and Copies of Photographs, Documents, and Other Tangible Evidence;
7. Demand for Inspection, Analysis, and Testing of Scientific Evidence;
8. Discovery Motion and Motion to Require the Prosecution to Disclose Evidence Favorable to the Defendant under *Brady v. Maryland*, 373 U.S. 83 (1963);
9. Notice to Produce;
10. Motion for Disclosure of Similar or Extrinsic Act Evidence and for Pretrial Hearing to Determine the Admissibility of Any Acts Alleged by the State to be Similar Transaction;
11. Motion to Require the State to Reveal any Agreement Entered between the State and any Prosecution Witnesses that Could Conceivably Influence Testimony;
12. Preliminary Motion to Suppress;
13. Motion to Suppress Defendant's Statements;
14. Motion for Severance of Defendants for Trial;
15. Motion to Suppress Electronic Surveillance;
16. Complete Recordation;
17. Due Process Information in Camera Inspection Request;
18. Due Process Information—General Request;
19. Due Process Information—Specific Requests;
20. Right to File Additional Motions;
21. General Demurrers.

It appears further that O.C.G.A. § 17-16-1, et seq. imposes certain obligations upon the counsel for both sides in a criminal case where the Defendant has filed an election to proceed

SCANNED

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under that statute. In order to assist the Court and parties in the expeditious handling of criminal matters, reduce costs, and unnecessary paperwork, the Court enters this STANDING ORDER for criminal case as follows:

In all cases in which counsel for the defendant files and entry of appearance, he/she may file a single pleading invoking the motions listed herein and attached hereto as Exhibits 1 through 21. That pleading may incorporate the Motions in the Exhibits by express reference thereto without the need to file those exhibits in each case file. The pleading shall be called MOTION TO INVOKE THE STANDING ORDER IN CRIMINAL CASES and shall refer to the minute book and page in which the motions are entered in the record of this Court. A motion in substantial compliance with the attached Exhibit 22 shall be deemed sufficient to invoke the Standing Order.

In addition, a defendant may file any additional motions within the time periods otherwise required by law or the Uniform Superior Court Rules, or as extended within the Court's discretion. See O.C.G.A. §17-7-110. The Court shall deem any motion filed within such timeframe timely.

By invoking the Standing Order, it shall be deemed that the State has made a proper demand for alibi information that complies with the law and the defendant shall comply with all provisions of O.C.G.A. § 17-16-5 concerning alibi evidence as required by law within the time limitations set forth in O.C.G.A. § 17-16-5 and all provisions of the Uniform Superior Court Rules, except as specifically ordered to the contrary herein. For the purposes of O.C.G.A. §17-6-5, the date, time, and place of the occurrence shall be deemed to be the same as alleged in the indictment unless the District Attorney provides specific date, time, and place to the contrary.

Upon the filing of the pleading invoking this Order, the Clerk shall note on the docket that "Standing Motions" have been filed.

This Order does not include any motions required by law to state grounds with particularity, provided however the defendant may file a preliminary motion to suppress which he/she may amend to fully apprise the State's counsel of the grounds asserted for suppression as well as the matters alleged subject to.

In the event of an appeal from the disposition or during the pendency of any criminal case in which the defendant has invoked the Standing Motions, the Clerk shall supplement the case file with a copy of the Standing Motions upon preparation of the record.

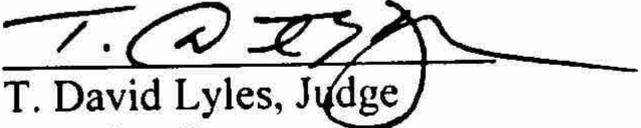
SO ORDERED, this 2ND day of January, 2018.



Tony S. Beavers, Chief Judge
Superior Court
Paulding Judicial Circuit



Dean C. Bucci, Judge
Superior Court
Paulding Judicial Circuit



T. David Lyles, Judge
Superior Court
Paulding Judicial Circuit

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EXHIBIT 1

**NOTICE OF DEFENDANT'S ELECTION TO
PROCEED UNDER O.C.G.A. §17-16-1, ET SEQ.,
OR UNDER O.C.G.A. §17-16-20, ET. SEQ.**

Defendant hereby provides written notice, pursuant to O.C.G.A. §17-16-2(a), that DEFENDANT elects to have the provisions of O.C.G.A. §17-16-1, et. seq., apply to this case, including but not limited to the Demand for Copy of Indictment or Accusation and List of Witnesses pursuant to O.C.G.A. §17-16-3, Motion for Disclosure and Inspection pursuant to O.C.G.A. §17-16-4, Motion for Statement of Witnesses pursuant to O.C.G.A. §17-16-7, and List of Names and Information pursuant to O.C.G.A. §17-16-8.

In the event the charges do not include felonies, then Defendant hereby invokes the provisions of O.C.G.A. §17-16-20, et. seq., including but not limited to the Demand for Copy of Indictment, Accusation or Citation and List of Witnesses pursuant to O.C.G.A. §17-16-21, Copy of Statement While in Police Custody pursuant to O.C.G.A. §17-16-22, and Demand for Copy of Written Scientific Reports pursuant to O.C.G.A. §17-16-23.

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EXHIBIT 2

MOTION FOR DISCOVERY OF STATEMENTS OF THE DEFENDANT

COMES NOW, the Defendant in the above-captioned matter, and pursuant to U.S. Const. amends. IV, V, VI, VIII, & XIV; Ga. Const. art. I, § 1, ¶¶ i, ii, xi, xii, xiv, xvi and xvii; O.C.G.A. §17-16-4(a)(1) (1994); and other applicable law, hereby moves this Court to ORDER the State to provide the defense with copies of any and all statements made by DEFENDANT, including but not limited to: (1) written version of any and all oral statements; (2) other accounts, reports, notes or summaries of any and all oral statements; (3) copies of any and all written statements; (4) CD copies of any and all oral statements; and (5) DVD copies of any and all videotaped statements. Additionally, Defendant moves this Court to BAR the State from using any such statements at trial for any purpose in the event that said statements are not revealed to the defense.

In support of this Motion, DEFENDANT states as follows:

1.

Defendant is charged in the above-styled case.

2.

Under O.C.G.A. §17-16-4(a)(1), a criminal defendant is entitled to: (a) copies of any written or recorded statements made by him in response to interrogation by any law enforcement personnel; (b) that portion of any written record containing the substance of any relevant oral statements made by him in response to interrogation by any law enforcement personnel; and (c) "the substance of any other relevant oral statements" made in response to interrogation by law enforcement personnel if the State intends to use it at trial.

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3.

Additionally, a criminal defendant is entitled to any other statements made by him while in custody, including statements made to inmates or other non-law enforcement personnel. Bell v. State, 179 Ga. App. 491, 347 S.E.2d 321 (1986).

4.

The prosecutor's duty to disclose extends to all statements within the "possession, custody, or control" of either his office or any law enforcement agency or other state agency. O.C.G.A. §17-16-4(a)(1). The prosecutor also has a duty to investigate whether the Defendant made any statements and, if so, to reveal those statements to the defense. See Gilbert v. State, 193 Ga. App. 375, 401 S.E.2d 581 (1991).

5.

The State is barred from using at trial any custodial statements which have not been provided upon a timely request. See McKenny v. State, 204 Ga. App. 411, 419 S.E.2d 82 (1991); Davis v. State, 198 Ga. App. 375, 401 S.E.2d 581 (1991).

6.

This Motion is made under the authority of Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1963); Napue v. Illinois, 360 U.S. 264, 79 S. Ct. 1173, 3 L. Ed. 2d 1217 (1959); Davis v. Alaska, 415 U.S. 308, 94 S. Ct. 1105, 39 L. Ed. 2d 347 (1974); United States v. Agurs, 427 U.S. 97, 96 S. Ct. 2393, 49 L. Ed. 2d 342 (1976); Giles v. Maryland, 386 U.S. 66, 87 S. Ct. 793, 17 L. Ed. 2d 737 (1967); and United States v. Noe, 821 F.2d 604 (11th Cir. 1987), as well as the constitutional and statutory authority cited above.

WHEREFORE, DEFENDANT requests that this Court:

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- (1) Order the State to provide to the defense any and all oral statements by DEFENDANT; copies of any accounts, reports, notes or summaries containing statements by DEFENDANT or references to statements by DEFENDANT; any and all written statements by DEFENDANT; audio copies of any and all audio-typed statements by DEFENDANT; and video copies of any and all videotaped statements by DEFENDANT;

- (2) Grant such other relief as is just and proper.

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EXHIBIT 3

**MOTION TO OBTAIN DISCOVERY OF STATEMENTS MADE BY
WITNESSES FOR THE STATE**

COMES NOW, the Defendant in the above-captioned case, and pursuant to U.S. Const. amends. VI, VIII, & XIV; Ga. Const. article I, §1, ¶¶ i, ii, xiv & xvii; O.C.G.A. §17-16-7 (1994); and other applicable law, hereby moves this Court to ORDER the State to provide the defense with any and all statements which are made by witnesses whom the State intends to call at any pretrial hearing or at trial, as well as any and all statements which are made by witnesses whom the State does not intend to call but which involve the subject matter of testimony of witnesses it does intend to call. Additionally, DEFENDANT moves this Court to BAR the State: (1) from calling at trial or at any pretrial hearing any witness who has made a statement not revealed to the defense; and (2) from using at trial or pretrial any part of the testimony of a witness that involves subject matter touched upon in a statement made by an uncalled witness and not revealed to the defense.

In support of this Motion, DEFENDANT states as follows:

1.

DEFENDANT is charged in the above-styled case.

2.

O.C.G.A. §17-16-7 requires the State to produce for the defense "any statement of any witness that is in the possession, custody or control of the State or prosecution...that relates to the subject matter concerning the testimony of a witness at trial or at [a] post-indictment pre-trial evidentiary hearing." This language encompasses statements made by witnesses whom the State intends to call at trial or any pretrial hearing [hereinafter "first hand statements"], as well as statements by uncalled witnesses which involve the subject matter of testimony of witnesses who will be called either at trial or pretrial [hereinafter "second hand statements"]. Id.

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3.

The prosecutor's duty to disclose extends to any statements within the possession, custody or control of either the office of the prosecuting attorney or any law enforcement agency involved in the investigation of the case. O.C.G.A. §17-16-1(1); Giglio v. United States, 405 U.S. 92, S. Ct. 763, 31 L. Ed. 2d 104 (1972).

4.

The "statement" of witnesses includes any written or recorded statements that have been signed or otherwise adopted or approved by the witness. O.C.G.A. §17-16-1(1)(A), as well as any "substantially verbatim recital" of any oral statements attributed to the witness, O.C.G.A. §17-16-1(2)(B), or any summary account of a statement contained in a memorandum, report or other written document. O.C.G.A. §17-16-1(2)(C).

5.

The State is obligated to provide the defense with both "first hand" and "second hand" statements, which include but are not limited to: copies of verbatim or substantially verbatim written versions of any and all oral statements; copies of written summaries contained in written documents of any and all oral or written statements; audio cassette copies of any and all audio taped statements; and video cassette copies of any and all videotaped statements. The only statements that the State is not required to disclose are those that do not relate to the subject matter of any witness' testimony. O.C.G.A. §17-16-7.

6.

This Motion is made under the authority of Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1963), and Napue v. Illinois, 360 U.S. 264, 79 S. Ct. 1173, 3 L. Ed. 2d 1217 (1959), as well as constitutional and statutory authority cited above.

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EXHIBIT 4

DEFENDANT'S REQUEST FOR INFORMATION DESCRIBED IN O.C.G.A. §17-16-8

Defendant hereby requests in writing that the State furnish to counsel for the Defendant all information required to be disclosed under O.C.G.A. §17-16-8. This request encompasses the State's witness list, including witness' full name, date of birth, Social Security Number, telephone number and witness' address or location. The Defendant makes this request pursuant to O.C.G.A. §17-16-8 and also under the provision of Ga. Const. art I, § 1, ¶ xiv. The Defendant further requests that the Court order that this information be furnished to counsel for the Defendant no later than ten days before trial, or as the Court directs.

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EXHIBIT 5

**DEMAND FOR PRODUCTION OF THE ACCUSED'S
CRIMINAL HISTORY PURSUANT TO O.C.G.A. §17-16-4(a)(2)**

DEFENDANT, having elected to have the provisions of O.C.G.A. §17-16-1, et seq., apply to DEFENDANT'S case, hereby requests in writing that the State produce to the defense a copy of the Defendant's Georgia Criminal Information Center Criminal History, as required by O.C.G.A. §17-16-4(a)(2).

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EXHIBIT 6

DEMAND FOR INSPECTION, ANALYSIS, AND COPIES OF
PHOTOGRAPHS, DOCUMENTS, AND OTHER TANGIBLE EVIDENCE

DEFENDANT, having elected to have the provisions of O.C.G.A. §17-16-1, et. seq., apply to his/her case, hereby requests in writing that the State disclose and produce to the defense for inspection, copying, photographing, examination, testing or analysis, as required by O.C.G.A. §17-16-4(a)(3), all books, papers, documents, photographs, tangible objects, audio and visual tapes, films and recordings, materials, items, buildings, places or information as described in O.C.G.A. §17-16-4(a)(3).

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EXHIBIT 7

DEMAND FOR THE INSPECTION, ANALYSIS, AND TESTING
OF SCIENTIFIC EVIDENCE

DEFENDANT, having elected to have the provisions of O.C.G.A. §17-16-1, et seq., apply to his/her case, respectfully demands the following:

- (1) Copies of any written scientific reports in the possession of the prosecution which will be introduced in whole or in part against the Defendant by the prosecution in its case-in-chief or in the rebuttal or where obtained from or belonged to the DEFENDANT. O.C.G.A. §17-16-4(a)(3). DEFENDANT gives notice of Intent to invoke the exclusionary provision of O.C.G.A. §17-16-6 in the event that there is a failure to timely comply with this demand. See Alexander v. State, 206 Ga. App. 375, 416 S.E.2d 762 (1992) (case reversed where DA served handwritten statement indicating that trace of cocaine was found at site but did not furnish available lab report).
- (2) The results of all scientific tests or experiments or studies made in connection with the above-styled case and copies of any reports, whether or not the State intends to introduce said items into evidence upon the trial of this case. O.C.G.A. §24-9-64; U.S. Const. amends. V & VI; Ga. Const. art. I, § 1.
- (3) The disclosure of any fingerprint, DNA, or fiber sample analysis and, if such analysis was performed:
 - (a) the results of all tests (including fingerprint and ballistics), experiments or comparisons performed on any and all materials, objects, or property seized from the Defendant, or from other persons, places, or objects searched and/or seized during the course of the investigation. Also, the complete report made by any scientist or expert who performed or was responsible for performing these tests, comparisons, or experiments, including such information as the [1] description of the object tested; [2] exemplars or standards to which the item was compared; [3] tests performed;

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[4] procedures followed for each test; [5] work sheets; [6] chain of custody for each item; and [7] a summary of the basis for the expert opinion rendered in the report. O.C.G.A. §17-16-4(a)(3) [formerly §17-7-211] and §35-9-64; U.S. Const. amend. VI; Ga. Const. art. I, § 1, ¶ xiv; Eason v. State, 260 Ga. 445, 396 S.E.2d 492 (1990) (basic principle of scientific testing is that careful records of test procedures and results be scrupulously maintained); Box v. State, 187 Ga. App. 260, 370 S.E.2d 28 (1988) (case reversed where State failed to provide exact numerical quantity of drug tested); Durden v. State, 187 Ga. App. 154, 369 S.E.2d. 764 (1988) (any evidence of scientific test offered by State in case-in-chief or rebuttal is subject to discovery).

(b) Any documentation regarding an attempt to perform any scientific test (fingerprint, ballistic, etc.), or procedure (identification, etc.) that may not have been completed or where the attempt to perform the test or procedure failed for some technical or other reason. O.C.G.A. §17-16-4(a)(3) [formerly §17-7-211] & §24-9-64; U.S. Const. amend. VI; Ga. Const. art. I, § 1, ¶ xiv; Eason v. State, 260 Ga. App. 445, 396 S.E.2d 492 (1990) (right to subpoena all work product of chemist); Foster v. California, 394 U.S. 440, 442 (1969) (case reversed where prosecution failed to disclose that witness failed to identify defendant the first time he confronted him and defendant was identified only after second and third lineups).

(4) The disclosure of any polygraph examination(s), and if such disclosure is affirmative, the results of such tests performed on any witness or potential witness which may be beneficial and useful to the Defendant to establish reasonable doubt or for purposes of impeachment. Defendant also requests the name, address and phone number of polygraph operator or operators. O.C.G.A. §17-16-4(a)(3) [formerly §17-7-211] & §24-9-64; U.S. Const. amend. VI; Ga. Const. art. I, § 1, ¶ xiv; Taylor v. State, 172 Ga. App. 408, 323 S.E.2d. 212 (1984) (reversible error where written report of polygraph

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examination not provided to defense in timely manner after O.C.G.A. §17-7-211 request).

- (5) The disclosure of any results or reports of physical or mental evaluations as specified in O.C.G.A. §17-16-4(a)(4).
- (6) A summary of the basis for any expert opinion rendered in a report which the State intends to introduce as evidence in its case-in-chief or rebuttal.
- (7) The opportunity to examine, test and analyze all evidence which the State intends to use as evidence in its case-in-chief or rebuttal or which was obtained from or belonged to the Defendant. O.C.G.A. 17-16-4(a)(3).
- (8) The Defendant reserves the right to:
 - (a) seek further discovery regarding the nature, extent, and procedures utilized in any laboratory testing and the qualification of any entity or individual performing such tests; and
 - (b) challenge the procedure or technique utilized in any scientific procedure pursuant to Harper v. State, 249 Ga. App. 519, 292 S.E.2d 241, 389 (1982) (trial court may make determination whether scientific procedure or technique has reached scientific state of verifiable certainty from evidence presented); Caldwell v. State, 260 Ga. App. 278, 393, S.E.2d. 436 (1990) (allowing trial court engaged in Harper review to also determine whether scientific procedures were performed in acceptable manner).

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EXHIBIT 8

**DISCOVERY MOTION AND MOTION TO REQUIRE THE PROSECUTION TO
DISCLOSE EVIDENCE FAVORABLE TO THE DEFENDANT UNDER
BRADY v. MARYLAND**

DEFENDANT moves the Court for an Order to require the prosecutor to make a pretrial production of the information hereafter specified.

This information is sought pursuant to the Due Process Clause of Ga. Const. art I, § 1, ¶ i, and U.S. Const. amend. V, made applicable to the States through U.S. Const. amend. XIV, as well as Ga. Const. art. 1, § 1, ¶ xii (guaranteeing indigent defendants the appointment of counsel and opportunity to prepare a defense). See Coates v. Lawrence, 465 F. Supp. 414 (S.D. Ga.), *aff'd*, 131 F.2d 110 (5th Cir. 1972), *cert. denied*, 318 U.S. 759, 63 S. Ct. 532, 87 L. Ed. 2d 1132 (1943).

Further, if this material is not produced, the Defendant's counsel will not be able to effectively represent the Defendant in this case, and thus, the Defendant will be denied the right to counsel and the right to confront witnesses, both of which are guaranteed under the provisions of Ga. Const. art. I, § 1, ¶ xiv, and U.S. Const. amend. VI, made applicable to the States through the U.S. Const. amend. XIV.

Additional authority for specific requests is noted where appropriate.

I. Prefatory Statement

This Motion addresses numerous items which may or may not be applicable to this case because Georgia provides no comprehensive discovery in criminal cases. Since there is no discovery, counsel will not know whether certain requested items even exist without a preliminary response to this Motion. Therefore, the Defendant may file additional motions depending upon the State's response to the various requests for disclosure of preliminary information.

Specifically, the Defendant requests:

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II. Discovery Requests

- (1) The address and telephone numbers for all persons interviewed during the investigation whose statements could be deemed exculpatory to the Defendant, whether or not they are to be called as a witness for the State. Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1963) (right to discovery of exculpatory material); Hicks v. State, 232 Ga. 393, 207 S.Ed.2d 30 (1974) (recognizing the applicability of Brady to state prosecutions).
- (2) Copies of any statements made by any witness in the case. Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1963) (right to discovery of exculpatory material); Napue v. Illinois, 360 U.S. 264, 79 S. Ct. 1173, 3 L. Ed. 2d 1217; and Giglio v. United States, 405 U.S. 150, 92 S. Ct. 763, 31 L. Ed. 2d 104 (1972) (convictions reversed where witness testified falsely and defense not provided with prior inconsistent statement); Giles v. Maryland, 386 U.S. 66, 87 S. Ct. 793, 17 L. Ed. 2d 737 (case remanded to determine if witness committed perjury in rape case); Rini v. State, 235 Ga. 60, 218 S.E.2d 811 (1975) (trial court erred in overruling defendant's Motion for Production at trial of statements of witnesses).
- (3) The disclosure of any line-up, photographic array, or other identification or identification related procedure that involved any witness or prospective witness, and if such disclosure is in the affirmative, all documents, sketches, pictures, or photographic arrays which have been made by, or shown to, any witness or prospective witness in this or any companion case. U.S. Const. amends. IV, V, & VI; Ga. Const. art. 1, § 1, ¶¶ i, xii, xiv, & xvi; Manson v. Brathwaite, 432 U.S. 98, 114 (1977) (once defendant establishes suggestivity in the identification process, court weighs "corrupting effect of the suggestive identification" against likelihood that witness nonetheless made reliable identification, and where suggestivity is weak, court should still inquire into reliability, as it is linchpin in determining admissibility of identification testimony). See also Neil v. Biggers, 409 U.S. 188 (1972)

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- (4) Any report or reports prepared by any law enforcement officer(s) in accordance with O.C.G.A. §17-4-20.1(c) (Family Violence Act). The Defendant is entitled to these reports pursuant to O.C.G.A. §17-4-20.1(d) and §19-13-1.
- (5) The description of all item(s) of physical evidence which the prosecution anticipates using in the trial of the Defendant. Disclosure of the existence of such items is necessary so that counsel can determine whether a motion for pretrial access is necessary to guarantee the Defendant's right to a fair trial. Park v. State, 254 Ga. 403, 330 S.E.2d 686 (1985) (where disclosure of a witness' statement occurred at trial, "[t]he appropriate standard to be applied...is whether the disclosure came so late as to prevent the Defendant from receiving a fair trial. [Cit.]' United States v. Sweeney, 688 F.2d 1131, 1141 (7th Cir. 1982).")
- (6) The make, serial number, sales and ownership history of any firearm which the prosecution may attempt to link to the Defendant or otherwise relate to this case. U.S. Const. amends. V & VI; Ga. Const. art. I, § 1, ¶¶ i, xii & xiv.
- (7) The disclosure of any photographic evidence, and if the State intends to seek the admission of any such evidence, that counsel be allowed an opportunity to review the same in advance of trial to determine whether a pretrial hearing is necessary to decide whether they are unnecessarily prejudicial or inflammatory. U.S. Const. amends. V & VI; Ga. Const. art. I, § 1, ¶¶ i, xii & xiv; Ramey v. State, 250 Ga. 455, 298 S.E.2d 503 (1983) (n.1, use of photographs should be limited to those which are relevant and illustrative of the issues); Brown v. State, 250 Ga. 862, 302 S.E.2d 347 (1983) (standard for admitting autopsy photographs); Osborne v. Wainwright, 720 F.2d 127 (11th Cir. 1983) (claim of fundamental unfairness is Federal constitutional issue and not State evidentiary issue).
- (8) Disclosure of the identity of any informant utilized by the State in this case. Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1963); Thornton v. State, 231 S.E.2d 729 (1977) (trial court erred in failing to conduct hearing to determine informant's status); Roviaro v. United States, 353 U.S. 53, 77 S. Ct. 623; 1 L. Ed. 2d 639 (1957) (state's interest in

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protecting informant must be weighed against right of defendant to full and fair opportunity to defend himself); Sowers v. State, 194 Ga. App. 205, 390 S.E.2d 110 (1990) (trial court erred in failing to conduct hearing where the informant was only person in position to refute officer's version of occurrence).

- (9) Disclose whether any physical, documentary, photographic, scientific, electronic or other potential evidence has been destroyed. Jordan v. State, 247 Ga. 328, 276 S.E.2d 224 (1981) citing United States v. Bryant, 439 F.2d 642 (D.C. Cir. 1971) ("only if evidence is carefully preserved during the early stages of the investigation will disclosure be possible later"); Arizona v. Youngblood, 488 U.S. 51, 109 S. Ct. 333, 102 L. Ed. 2d 281 (1988) (bad faith in preserving evidence is denial of due process).
- (10) Disclose whether any agent of the prosecution, informer, or anyone else at the direction of the prosecution, has talked with or communicated with the Defendant since the return of this indictment or while the Defendant was in custody. If so, identify each individual and the circumstances surrounding the contact. Maine vs. Moulton, 474 U.S. 159, 106 S. Ct. 477, 88 L. Ed. 2d 481 (1985) (where informer placed in indicted subject's jail cell to elicit information, incriminating statements made to the informer after right to counsel had attached should have been ruled inadmissible at trial).
- (11) Disclose whether any evidence which the State will seek to introduce at trial was created, evaluated, generated, or enhanced by the use of computers, and if so, disclose if the State will make available to the Defendant the software or computer program(s) used to evaluate, generate or enhance such evidence. U.S. Const. amends. V & VI; Ga. Const. art. I, § 1, ¶¶ i, xii & xiv.
- (12) The full names and addresses of all persons who have given information to the prosecuting attorney or law enforcement officers relating to the arrest of the Defendant and the charges against him/her. U.S. Const. amends. V & VI; Ga. Const. art. I, § 1, ¶¶ i, ii, vi, xii & xiv.
- (13) The names and address of all unindicted co-conspirators. U.S. Const. amends. V & VI; Ga. Const. art. I, § 1, ¶¶ i, ii, vi, xii & xiv.

- (14) Copies of any and all reports of scientific tests that were performed upon any person or evidence relative to this case including the names of the person conducting the test, the type of test performed, and upon what evidence said test was performed, including rape kit tests or tests on blood, pubic hair or semen.
- (15) Copies of all contact sheets, Form 452 notes, transcripts of interviews, notes of interviews, and records concerning an alleged victim, whether involving Defendant or any other person in any file maintained by the Department of Family and Children Services. Strickland v. State, 205 Ga. App. 473 (1992); Smith v. State, 259 Ga. 135, 377, S.E.2d 158; Pennsylvania v. Ritchie, 480 U.S. 39, 107 S. Ct. 989, 94 L. Ed. 2d 40 (1987); Aguilar v. State, 202 Ga. App. 62 (1991).
- (16) Any information that would effect the admissibility of child hearsay including, but not limited to: (a) the atmosphere and circumstances under which the statement was made, including the time, place, and people present; (b) the spontaneity of the child's statement to the persons present; (c) the child's age; (d) the child's demeanor; (e) the child's condition, physical or emotional; (f) the presence or absence of threats or promise of benefits; (g) the presence or absence of drugs or alcohol; (h) the child's general credibility; (i) the presence or absence of any coaching by parents or other third parties before or at the time of the child's statement, the type of coaching and circumstances surrounding the same, and the nature of the child's statement and type of language used therein; and (j) the consistency between repeated out-of-court statements by the child, including all inconsistent statements by the child and all videotaped interviews with the alleged victim and all child abuse reports. Weathersby v. State, 262 Ga. 126 (1992).
- (17) There may be other items and matters of evidence, information and data in existence that are not enumerated aforesaid, and of which Defendant is unaware. Defendant now requests and demands that he/she be afforded with any and all evidence and information, whether specifically delineated and listed herein or not, which is known or may become known, or which through due diligence may be learned from the investigating officers or the

witnesses or persons having knowledge of this case, which is exculpatory or favorable material, or which might serve to mitigate punishment. This includes any evidence impeaching or contradicting the testimony of prosecution witnesses, or instructions to prosecution witnesses not to speak or disclose the facts of the case with defense counsel. Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1968); Giglio v. United States, 405 U.S. 150, 92 S. Ct. 763, 31 L. Ed. 2d 104 (1972); Holbrook v. State, 162 Ga. App. 400, 401, 291 S.E.2d 729 (1982) (exculpatory witness statements are subject to disclosure under Brady); Sellers v. Estelle, 651 F.2d. 1074, 1077, n.6 (5th Cir. 1981) (withholding of such reports constitutes reversible error).

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This 3 of Jan, 2018
Trevia W. Shelton, Clerk of Superior Court

EXHIBIT 9

NOTICE TO PRODUCE

TO: Paulding County District Attorney's Office

You are hereby notified to produce and have upon the trial of the above-styled case and at all hearings on said case, and from time to time, and term to term, hereafter until this case is finally concluded, the following items, documents, records and papers:

- (1) Copies of any written waiver or any rights or judicial process executed or alleged to be executed by Defendant;
- (2) Copies of all reports of any scientific tests or experiments or studies made in connection with the above-styled case;
- (3) All fingerprint documents and reports related to the case;
- (4) The criminal records of all persons whom the State intends to call as a witness in the trial of Defendant;
- (5) All written and recorded statements and all summaries or memoranda of any oral or written statements made by Defendant;
- (6) All diagrams, sketches, and pictures which have been made by, or shown to, any witness or prospective witness in this case so that they may be used as evidence on behalf of the Defendant. Sims v. State, 251 Ga. 877, 311 S.E.2d. 161 (1984);
- (7) The arrest warrant for Defendant, if applicable;
- (8) Copy or copies of any search warrant(s), affidavits supporting the same and returns relating to this case;
- (9) Copies of all inventory documents which catalog items seized from the Defendant, including property and currency, obtained by the prosecution voluntarily, by seizure, or by process pursuant to the Defendant's arrest or during the investigation of this case;
- (10) Copy or copies of any statements of co-conspirator(s) or co-defendant(s) exculpatory or mitigating to Defendant;

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Page 89, Paulding County Georgia Records
This 3 day of Jan., 2018.
Trevia W. Shelton, Clerk of Superior Court

- (11) Copy or copies of any statements made by any witness in this case;
- (12) Copy or copies of any grant(s) or promise(s) of immunity to witness(es) for the State;
- (13) Copy or copies of any testimony known to be false;
- (14) Copy of the arrest or incident report(s) relating to Defendant and this case;
- (15) Copy or copies of any exculpatory statements of witness(es) or non-witness(es) known to the prosecution. Holbrook vs. State, 162 Ga. App. 400, 291 S.E.2d 729 (1982);
- (16) Any photo array displayed to any witness(es) or potential witness(es);
- (17) Any report or reports prepared by any law enforcement officer(s) in accordance with O.C.G.A. §17-4-20.1(c) (Family Violence Act); O.C.G.A. §17-4-20.1(d) and §19-13-1;
- (18) Copies of all contact sheets, Form 452 notes, transcripts of interviews, notes of interviews, and records concerning an alleged victim, including all prior allegation of molestation by an alleged victim, or against an alleged victim, whether involving Defendant or any other person in any file maintained by the Department of Family and Children Services.

This Notice to Produce is brought pursuant to O.C.G.A. §24-10-26, made applicable to criminal cases O.C.G.A. §24-10-29 and Brown v. State, 238 Ga. 98, 231 S.E.2d 65 (1976); U.S. Const. amends. IV, V, VI, & XIV; Ga. Const. art. I, § 1, ¶¶ i, ii, xii, xiii & xiv; O.C.G.A. §24-9-64.

The Defendant is absolutely entitled to any of the above items that are exculpatory in nature or which "create[] a reasonable doubt as to the [D]efendant's guilt." Wilson v. State, 246 Ga. 62, 268 S.E.2d 895 (1980), quoting United States v. Agurs, 427 U.S. 97, 96 S.Ct. 2392, 49 L.Ed.2d 342 (1976); see also Smith v. State, 248 Ga. 507, 284 S.E.2d 406 (1981).

Further, in a criminal case, a Notice to Produce pursuant to O.C.G.A. §24-10-26, may compel the production of books, documents, or tangible things in the State's possession "where such books, etc... would be admissible and are needed for use as evidence on behalf of the defendant." Sweetenburg v. State, 197 Ga. App. 36, 397 S.E.2d 451 (1990).

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 This 3 day of Jan, 2013.
 Ina W. Shelton, Clerk of Superior Court

Where a motion is made and the prosecutor does not make the specified material available to defense counsel, the trial judge should make an in camera inspection of the material sought. On motion by the Defendant, the material examined in camera should either be sealed and filed, or an inventory or record of the examined material made so as to permit appellate review. Id.

The items requested are to be used either as direct evidence by the Defendant during the presentation of the case-in-chief or for purposes of impeachment.

Filed and recorded in Minute Book 52.
Page 91, Paulding County Georgia Records
This 3 day of Jan., 2018.
The Honorable _____, Clerk of Superior Court

EXHIBIT 10

**MOTION FOR DISCLOSURE OF SIMILAR OR EXTRINSIC ACT EVIDENCE AND
FOR PRETRIAL HEARING TO DETERMINE ADMISSIBILITY OF ANY ACTS
ALLEGED BY THE STATE TO BE SIMILAR TRANSACTIONS WITH AUTHORITY**

Defendant moves the Court for an order compelling the State to produce any similar or extrinsic act, generally bad character or prior conviction evidence that the State anticipates attempting to introduce against Defendant as proof of intent, motive, plan, scheme, bent of mind, and/or course of conduct, or in cross-examination of the Defendant, should Defendant testify at trial, as provided for in O.C.G.A. §24-9-20(b).

Specifically, Defendant seeks information pertaining to the identity of individuals and the dates and transactions alleged to be extrinsic act evidence or evidence of general bad character or prior convictions of the Defendant.

The Defendant submits that disclosure of the evidence described by this Motion is required by the Due Process Clause of U.S. Const. amends. V & XIV as well as Ga. Const. art. I, § 1, ¶ i.

Prompt pretrial production of this type of evidence is in accordance with Uniform Superior Court Rule 31.3 and will enable Defendant to prepare appropriate legal objections to the admissibility of such evidence, such as an objection establishing insufficient similarity or connection between the independent crime or misconduct and the offense for which the Defendant is presently on trial. The Defendant respectfully submits that there is no valid jurisdiction for non-disclosure at this junction.

Defendant further moves for a pretrial hearing, pursuant to Rule 31.3 of the Uniform Rules for the Superior Courts to determine the admissibility of any alleged similar transaction(s) which the State will seek to introduce at trial against the Defendant.

Rule 31.3 provides, in pertinent part, that the Court "shall hold a hearing at such time as may be appropriate, and may receive evidence on any issue of fact necessary to determine the request, out of the presence of the jury."

While Rule 31.3 does not mandate a pretrial hearing, it does require that the Court make its determination outside the presence of the jury. Counsel submits that a

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This 3 day of Jan, 2018.
Trena W. Shelton, Clerk of Superior Court

pretrial hearing will be in the interest of judicial economy in that the jury will not be inconvenienced by any extended presentation of evidence or argument. In addition, if the hearing is held pretrial, counsel will be able to provide the Court with briefs on any issue of law which may develop.

Finally, the pretrial determination of admissibility will assist both the State and Defendant in the organization and presentation of their respective cases.

In Poole v. State, 201 Ga. App. 554, 411 S.E. 2d 562 (1991), the Georgia Court of Appeals noted in dicta that it "is preferable that the (31.3) hearing be held before trial." In that case, the State's Attorney made a reference in his opening statement to a prior drug distribution offense which, as of that time, had not been ruled admissible by the Court. Although there was no error in that case because it was later determined that the act was admissible as a similar transaction, the possibility for mistrial clearly existed. Counsel suggests that, here, a pretrial hearing will alleviate this type of predicament.

WHEREFORE, the Defendant requests that his motion for pretrial hearing on this matter be granted.

Filed and recorded in Minute Book 52
Page 93, Paulding County Georgia Records
This 3 day of Jan., 2018
Tara M. Shelton, Clerk of Superior Court

EXHIBIT 11

MOTION TO REQUIRE THE STATE TO REVEAL ANY AGREEMENT ENTERED INTO BETWEEN THE STATE AND ANY PROSECUTION WITNESS THAT COULD CONCEIVABLY INFLUENCE HIS OR HER TESTIMONY

Defendant moves the Court for an Order requiring the State to reveal any agreement entered into between the District Attorney's Office or any other law enforcement agency and any prosecution witness that could conceivably influence the witness' testimony. The credibility of prosecution witness(es) will be an important issue in this case. The evidence of any understanding or agreement as to future prosecution or any other consideration is relevant to that issue.

Defendant specifically requests that the prosecution disclose whether any witness, co-defendant or co-conspirator, in return for any consideration from the State in any form whatsoever, has agreed to testify, provide evidence or information leading to evidence, or in any other manner agreed to assist the State in the prosecution of this action. This encompasses any and all considerations or promises of consideration given to or made on behalf of co-conspirators, whether indicted or unindicted, and any other government witness. By "consideration," the Defendant refers to absolutely anything of value or use, including, but not limited to, immunity, grants, witness fees, release on bail without security, special witness fees, transportation assistance, assistance to members of witness' families or associates of witnesses, assistance or favorable treatment with respect to any criminal, tax, civil, forfeiture or administrative disputes or potential dispute with the State or the United States (including any possible probationary, parole or deferred prosecution situation), placement in a "witness protection program," and anything else which could arguably create an interest or bias the witness in favor of the State or against the defense or act as an inducement to testify or color testimony. See Giglio v. United States, 405 U.S. 150, 92 S. Ct. 763, 31 L. Ed. 2d 104 (1972) (evidence of expected leniency by prosecution witness who is or could be charged or convicted of crime is relevant to question of witness credibility); Jolley v. State, 254 Ga. 624, 331 S.E.2d 516 (1985) (state under duty to reveal any agreement, even informal one, with witness concerning criminal charges pending

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Page 94, Paulding County Georgia Records
This 3 day of Jan, 2018.
Troy A. McClinton, Clerk of Superior Court

against him); Allen v. State, 128 Ga. App. 361, 196 S.E.2d 660 (1972) (good faith of the prosecutor, regarding knowledge of leniency conveyed to witness, is immaterial).

The refusal of the prosecution to reveal any said agreement constitutes a violation of U.S. Const. amends. V & VI and Ga. Const. art. I, § 1, ¶¶ i, ii, xii & xiv.

Filed in Courtroom Minute Book 52
Page 95, Paulding County, Georgia Records
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Book Clerk

EXHIBIT 12

PRELIMINARY MOTION TO SUPPRESS

The above-named defendant moves the Court to suppress all evidence illegally seized by law enforcement agents during the investigation of this case, including post-arrest statements of the Defendant and intercepted oral or wire communications of the Defendant. As the Defendant has not been furnished with full discovery at this time, he requests the opportunity to particularize this Motion within a reasonable time of receiving such information.

Filed and recorded in Minute Book 52
Page 96, Paulding County Georgia Records
This 3 day of Jan., 20 18
Tetra W. Shelton, Clerk of Superior Court

EXHIBIT 13

MOTION TO SUPPRESS DEFENDANT'S STATEMENTS

The Defendant in the above-styled action and prior to trial moves this Court to suppress any and all statements made by him to law enforcement officers after his arrest. Defendant prays for a Jackson v. Denno, 378 U.S. 368 (1964), hearing to determine whether the statements were voluntary in the totality of the circumstances and to determine the validity of any waiver of counsel prior to the interrogation. Defendant also prays that he be granted a hearing prior to trial to determine whether the statements were voluntarily given.

Filed and recorded in Minute Book 52.
Page 97, Paulding County Georgia Records
This 3 day of Jan., 2018.
Theresa Williams, Clerk of Superior Court

EXHIBIT 14

MOTION FOR SEVERANCE OF DEFENDANTS FOR TRIAL

Defendant moves for a grant of severance of Defendants for separate trials should he be joined in the above-styled action for a joint trial with any alleged accomplice or co-defendant. Defendant requests that this Court consider the legal and factual showing as this Defendant shall make at a hearing hereon in support of this request for severance. Defendant would show this Court that severance of the Defendant is necessary to prevent evidence admissible only against one Defendant from being considered against the other, for the reason of extreme prejudice from antagonistic defenses, and to enable this Defendant to call the co-defendant as a witness.

Filed and recorded in Minute Book 52.
Page 98, Paulding County Georgia Records
This 3 day of Jan, 2018.
Tara M. Blanton, Clerk Superior Court

EXHIBIT 15

MOTION TO SUPPRESS ELECTRONIC SURVEILLANCE

Defendant brings this motion to suppress any electronic eavesdropping which may have been conducted in the above-styled case and to furnish the substance of such evidence if reduced to writing. Defendant prays for an Order from this Court directing the Prosecuting Attorney to comply immediately with the provisions of the Georgia and Federal wiretap laws.

Filed for records in Minute Book 52.
Page 99, Particular County Georgia Records
Date 3 of Jan, 2012.
Filed at _____, Georgia Court

EXHIBIT 16

COMPLETE RECORDATION

Defendant moves this Court to enter an Order in the above-styled case that the Court Reporter shall record all proceedings and shall omit nothing unless specifically waived on the record by the Defendant.

Filed and recorded in Minute Book 52.
Page 100. Published by Georgia Records
This 3 day of Jan, 2018.
Wanda C. Clifton, Clerk of Superior Court

EXHIBIT 17

DUE PROCESS INFORMATION IN CAMERA INSPECTION REQUEST

Defendant requests that the State, its agents and the Prosecuting Attorney be required to produce any and all information requested in paragraphs numbered 13 and 14 hereinafter. Defendant further requests that he be allowed through his counsel to examine all information in the State's file to determine the presence or existence of any of the information requested in paragraphs numbered 14 and 15 hereinafter. Regardless of the announcement of the State as to the existence of such information, the Defendant, if not allowed to examine all said files, requests that this Court conduct an IN CAMERA inspection of said files, and preserve a copy of what is examined, in order that the Court will reveal to the Defendant any of the information requested in paragraphs numbered 14 and 15, hereinafter.

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Page 101, Paulding County, Georgia Records
Tab 3 of Jan., 2018
The Honorable Court Clerk for Court

EXHIBIT 18

DUE PROCESS INFORMATION – GENERAL REQUEST

Defendant requests that the State, its agents, and the Prosecuting Attorney reveal to the Defendant any and all information which might be relevant or lead to the discovery of relevant information which would:

- (1) be favorable to the Accused on any element of the required proof in the above-styled charges;
- (2) be useful in mitigation of any possible punishment;
- (3) be relevant to establishing reasonable doubt;
- (4) in any way be relevant to any Motion to Suppress Evidence tending to corroborate or suggest the possibility of a violation of Fourth Amendment rights;
- (5) mitigate forfeiture or the extent of forfeiture; or,
- (6) tend to support any other Motion filed by the Defendant which, if ruled upon favorably by the Court, would be favorable to the defense of the Defendant.

Filed and recorded in Minute Book 52.
Page 102. Paulding County Georgia Records
This 3 day of Jan., 20 18.
Trena W. Shelton, Clerk of Superior Court

EXHIBIT 19

DUE PROCESS INFORMATION – SPECIFIC REQUESTS

Defendant specifically requests the following information which is in the knowledge of the State, its agents, and/or the Prosecuting Attorney:

A. Any statement by an alleged accomplice, whether charged or not, which is favorable to the Accused in any of the ways described in paragraph 14 herein above.

B. Any statement by any witness or person interviewed which is favorable to the accused in any of the ways described in paragraph numbered 14 herein above.

C. Any information, tests, or examinations which negate or fail to establish:

(1) The presence of the Defendant's fingerprints on contraband charged, its containers, or other items to which it is sought to link the Defendant by contact;

(2) The presence of the Defendant at the scene of the crime or some other incriminating location;

(3) A link between the blood or other bodily fluids of the Defendant and any incriminating location or item of evidence or potential evidence;

(4) A link between the handwriting of the Defendant and any document sought to be linked to the Defendant;

(5) A link between the Defendant and any item of any kind with which it is sought to prove or suggest a connection between the Defendant and presence at the scene of a crime by the Defendant;

(6) A link in any gun ever attributed to the possession of the Defendant and a gun possessed at the crime or used in the crime;

(7) A connection between the Defendant and any automobile; or,

(8) Any other similar matter investigated where any negative finding or failure to link could be considered by the trier of facts as tending to negate the Defendant's involvement in the above-styled charged crime.

D. Any oral or written description or information furnished by any witness to the alleged crime which:

(1) Is different from the appearance of the Defendant;

(2) Fails to disclose any important feature of the Defendant, i.e., race, scars, tattoos, discolorations, nationality, deformities, etc.

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Page 103, Paulding County Georgia Records
This 3 day of Jan., 20 18.
Trevia W. Shelton, Clerk of Superior Court

as at any time qualified with statements that such identification or
can absolutely certain;

ates any item of clothing worn or carried which is different from
given by other witnesses or different from items of clothing known
to be the clothing worn by the perpetrator at the relevant times.
ence and/or information indicating or suggesting the Defendant's
capacity, intoxication, or delusional behavior at or near the time of

ess or person interviewed indicating self-defense, provocation, or
the crime, arrest, search, etc., in any relevant manner differently
ed to by any witness called by the State.

mation and/or evidence indicating, with regard to any witness for
liability; faulty recollection of the facts; having been instructed not
counsel; unstable mental condition; status as a government
nt romantic involvement with any witness for the State or with the
ithfulness.

mation and/or evidence indicating or suggesting the possibility
e above-named Defendant committed the above-styled charged

ntity of any informant relied upon in the investigation and/or
love-charged case and a Hearing relative to this request to
i informant was a witness to or participant in the transaction to
ve information or testimony.

mation, statement, admission, indication, or disclosure that the
ghts of the Defendant, or another present with the Defendant,
i violated.

Filed and recorded in Minute Book 52.
Page 104, Paulding County Georgia Records
This 3 day of Jan, 2018.
The State of Georgia, Paulding County Court

EXHIBIT 20

RIGHT TO FILE ADDITIONAL MOTIONS

The Defendant moves the Court for an order reserving the right to file, for good cause shown, such additional motions as the future progress of the case may merit.

Filed and recorded in Minute Book 52.
Page 105 Paulding County Georgia Records
The 3 day of Jan, 2018.
The Clerk of the Court

EXHIBIT 21

GENERAL DEMURRERS

COMES NOW, Defendant, at or prior to arraignment, and without waiving formal arraignment or any other rights to which he is entitled, and files these his General Demurrers to the above-styled action as follows:

- (1) Defendant demurs generally to said indictment, accusation or citation on the grounds that the same fails adequately to charge this Defendant with any offense against the laws of the State of Georgia;
- (2) Defendant demurs generally to said indictment, accusation or citation on the grounds that the same fails to sufficiently set out the charge against this Defendant;
- (3) Defendant demurs generally to said indictment, accusation or citation on the grounds that it fails to specifically set out the date of the offense.

WHEREFORE, Defendant prays that these demurrers be inquired into and that they be sustained and that the above-styled indictment, accusation or citation be dismissed and quashed.

Filed and recorded in Minute Book 52.
Page 106, Paulding County Georgia Records
This 3 day of Jan, 2018.
not a W. Blanton, Clerk of Superior Court

EXHIBIT 22

IN THE SUPERIOR COURT OF PAULDING COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

V.

CASE NO(S) _____

Defendant

MOTION TO INVOKE THE STANDING ORDER IN CRIMINAL CASES
AND WAIVER OF ARRAIGNMENT

COMES NOW, the Defendant in the above-styled case and hereby invokes the Motions identified in the Court's Standing Order recorded on _____, 20____, in the Minutes of the Court in Book _____, Page _____, and incorporates the Motions listed as Exhibits 1-21 inclusively as may be appropriate.

Further, the above-named Defendant by and through his/her attorney hereby waives his/her right to be present at formal arraignment and enters a plea of Not Guilty to the above-referenced charge(s) and hereby demands a Trial by Jury in the above-styled matter.

This _____ day of _____ 2010.

Respectfully submitted,

Attorney for Defendant
Paulding Judicial Circuit
Georgia Bar No. _____

CERTIFICATE OF SERVICE

The foregoing MOTION and WAIVER is certified by the undersigned as having been served upon the Prosecuting Attorney or his/her Assistant for the Court above-styled via HAND DELIVERY.

This _____ day of _____ 2010.

280 Constitution Blvd.; Room 1086
Dallas, GA 30132
770-443-3463

Attorney for Defendant
Paulding Judicial Circuit
Georgia Bar No. _____

Filed and recorded in Minute Book 52
Page 107, Paulding County Georgia Records
This 3 day of Jan, 2018.
Tera W. Shelton, Clerk of Superior Court