

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,

v.

WILLIAM RODERICK BRYAN,
Defendant.

)
) Warrant Nos. _____
)
) Murder; Criminal Attempt to Commit False
) Imprisonment
)

NOTICE TO PRODUCE

TO: Custodian of Records and Custodian of Evidence
Georgia Bureau of Investigation
Kingsland, Georgia

You are hereby notified, pursuant to O.C.G.A Section 24-13-27, to produce and have upon the trial of the above-styled case and at all hearings and from time to time, and term to term, hereafter until said case is finally concluded the following documents, records, and papers:

1. The complete investigative file(s) associated with the above-referenced case including copies of all reports, documents, letters and memoranda connected with the said charges against the named defendant.
2. All written statements of witnesses in the possession of said law enforcement agency relating to the charges against the named defendant in the above styled indictment, as well as all statements relating to any other defendants named in the above-styled indictment.
3. Names, addresses and telephone numbers and whereabouts of all witnesses to be called by the State in the trial of the named defendant and any other defendants named in the above styled indictment.
4. Statements of all persons including memoranda, summaries or recordings of such statements of any person, made to any law enforcement officer or the investigative staff of any prosecutor in any way connected with the above-styled case.

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Rosalynn Adams
CLERK SUPERIOR COURT

5. All memoranda, documents and reports of all law enforcement officers connected with subject matter of the indictment referred to above as well as the same of the investigative staff of all prosecutors.

6. Results of all reports of any scientific tests or experiments or studies made in connection with the above-styled case and all copies of such reports.

7. All fingerprint documents and reports related to the crime alleged to have been committed by the named defendant.

8. The full names and addresses of all persons who may have some knowledge of facts of the present case in addition to names and addresses given to the attorney for the named defendant.

9. The full names and addresses of all informers and other persons who gave information which served as a basis for the affidavits for the arrest and/or search warrants issued in connection with the above-styled case.

10. The criminal records of any co-defendant, witness, potential witness, or person of interest that were obtained in the course of the above-referenced case/investigation including any list or summary reflecting criminal records of any potential witness in the above-styled case.

11. All written and recorded statements and all summaries or memoranda of any oral or written statements made by the named defendant and all other defendants named in the above styled indictment.

12. All diagrams, sketches, and pictures including but not limited to any computer generated or enhanced images which have been made by or shown to any witness or prospective witness in the above styled case.

13. Any photo spreads, lineups or other tangible or intangible evidence with respect to any effort made by law enforcement officers to identify any individuals in the course of the above-styled investigation.

14. Any and all rough notes made by any law enforcement officer in the course of the investigation of the above-styled case.

15. Any and all texts, instant messages, chats, emails or other tangible, digital and/or electronic evidence of communications between law enforcement officers concerning the above-styled case or between law enforcement officers (including communications between law enforcement officers employed by other departments) and potential witnesses or between law enforcement officers and prosecutors or the media.

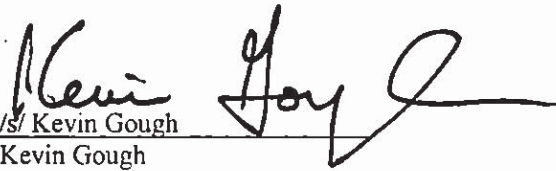
16. Any and all diagrams, sketches, photographs, audio and/or video which have been made by or shown to any witness or prospective witness in the above styled case or which may be used by the State in the examination of any such witness including or otherwise used by the State at any evidentiary hearing or trial including but not limited to any evidential summaries, reenactments, reconstructions, or other demonstrative evidence.

17. Any and all tangible and/or intangible evidence of any kind which was logged into evidence or otherwise secured by law enforcement officers in connection with the above-styled investigation and case.

18. Any and all analog or digital devices seized by law enforcement officers in connection with this case including but not limited to cell phones, tablets, laptop or desktop computers, storage drives, security cameras, etc.

Said records are to be used as evidence pertinent to the cause in question and to be used for purposes of impeachment, the selection of a jury and other purposes relevant to the trial of said case.

This 28th day of May, 2020.

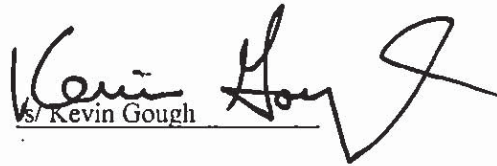

/s/ Kevin Gough
Kevin Gough
ATTORNEY FOR DEFENDANT
Georgia Bar No. 303210

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CERTIFICATE OF SERVICE

COMES NOW Kevin Gough, attorney for the defendant, and hereby certifies that a copy of the foregoing document(s) have been served upon the District Attorney by email delivery this date.

This 28th day of May, 2020.


/s/ Kevin Gough

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