

FILED
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2020 MAY 27 A 11:08
Ronald M. Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)
)
 v.) CRIMINAL ACTION NO: _____
)
 WILLIAM RODERICK BRYAN,) Warrants: Felony Murder; Criminal Attempt to
 Defendant.) Commit False Imprisonment

**MODIFIED MADDOX MOTION / MOTION FOR DISCLOSURE OF
SEARCHWARRANT(S) AND RELATED DOCUMENTS INSTANTER**

COMES NOW Defendant William Roderick Bryan, by and through undersigned counsel, without waiving arraignment or any other rights, pursuant to the Fifth and Fourteenth Amendments to the United States Constitution, Article I, Section I, Paragraph I of the Constitution of the State of Georgia, and Maddox v. State, 136 Ga. App. 370, 221 S.E.2d 231 (1975), and files this "Modified Maddox Motion / Motion for Disclosure of Search Warrant(s) And Related Documents *Instanter*." Defendant moves this Court to enter an order compelling the District Attorney to provide Defendant with a complete photocopy of any search warrants issued in connection with the above-styled case, including but not limited to the application(s), supporting affidavit(s), search warrant(s), return(s) and inventories. In support of said motion, Defendant shows as follows:

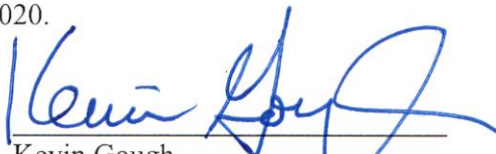
1. The requested documents are public records, see, e.g., O.C.G.A. §17-5-22 & §17-5-29; O.C.G.A. § 50-18-70 et seq. (Georgia Open Records Act); and Uniform Superior Court Rule 36.5; and as such these documents are subject to discovery *instanter*.

2. However, there are numerous judicial officers and courts that could have issued search warrants in the above-styled case and several different clerk's offices to which law enforcement agencies may have been returned said warrants. Moreover, there are no practical remedies for the failure of law enforcement agencies to timely return such documents to the clerk as contemplated by Georgia law. As a practical matter, therefore, the State is in a far better position to obtain and

timely produce said documents. And for discovery purposes, the respective law enforcement agencies and District Attorney's offices are essentially treated as one anyway, such that the Court should direct the State to promptly furnish said documents to the defense.

WHEREFORE, Defendant prays that this Honorable Court grant defendant's "Modified Maddox Motion," and compel the State to furnish Defendant with a copy of said documents instantler.

So moved, this 27th day of May, 2020.

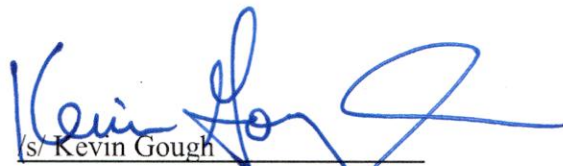

Kevin Gough
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Georgia Bar No. 303210

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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 27st day of May, 2020.


/s/ Kevin Gough