

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA, )  
 )  
 v. ) Warrant Nos. \_\_\_\_\_  
 )  
 WILLIAM RODERICK BRYAN, ) Murder; Criminal Attempt to Commit False  
 Defendant. ) Imprisonment

**DEFENDANT'S REPLY TO STATE'S RESPONSE TO MADDOX MOTION**

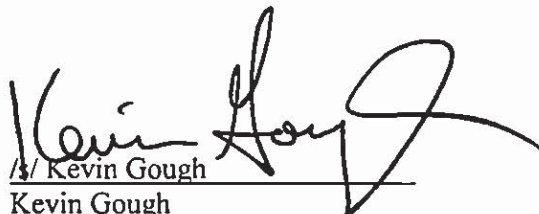
COMES NOW Defendant William Roderick Bryan, by and through undersigned counsel, and files this his "Defendant's Reply to State's Response to Maddox Motion." Defendant shows as follows:

The State cannot cite a single case undermining the authority of the Maddox case. It remains the law in Georgia. It is derivative of Brady, and its progeny, and is based in state and federal due process rights. Dicta in the decision about the state of Georgia's criminal discovery provisions at the time does not alter the specific due process right granted therein.

The State also ignores the plain requirements of O.C.G.A. § 17-5-22, which in relevant part provides: "The warrant, the complaint on which the warrant is issued, the affidavit or affidavits supporting the warrant, and the returns shall be filed with the clerk of the court of the judicial officer issuing the same, or with the court if there is no clerk, at the time the warrant has been executed or has been returned "not executed"; provided, however, that the judicial officer shall keep a docket record of all warrants issued by him, and upon issuing any warrant he shall immediately record the same, within a reasonable time, on the docket." The notion that search warrants are only discoverable through the criminal discovery statutes is, once again, frivolous.

FILED  
CLERK'S OFFICE  
2020 JUN - 1 A 11:40  
Ronald M. Adams  
CLERK SUPERIOR COURT

So replied, this 1<sup>st</sup> day of June, 2020.

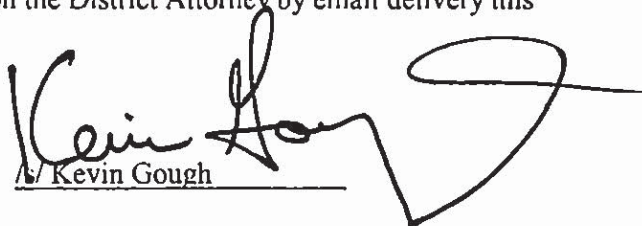
  
/s/ Kevin Gough  
Kevin Gough  
ATTORNEY FOR DEFENDANT  
Georgia Bar No. 303210

Kevin Gough Firm, LLC  
501 Gloucester Street, Suite 121  
Post Office Box 898  
Brunswick, GA 31521  
(912) 242-5114  
[kevingough.firm@gmail.com](mailto:kevingough.firm@gmail.com)

**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 1<sup>st</sup> day of June, 2020.

  
/s/ Kevin Gough

Kevin Gough Firm, LLC  
501 Gloucester Street, Suite 121  
Post Office Box 898  
Brunswick, GA 31521  
(912) 242-5114  
[kevingough.firm@gmail.com](mailto:kevingough.firm@gmail.com)