

FILED
 CLERK SUPERIOR COURT
 2020 JUN -2 P 3:24
Russell M. Adams

IN THE SUPERIOR COURT OF GLYNN COUNTY
 STATE OF GEORGIA

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

**SECOND PARTICULARIZED MOTION FOR DISCLOSURE OF BRADY MATERIAL,
 AND FOR OTHER RELIEF, AND MEMORANDUM IN SUPPORT THEREOF.**

COMES NOW Defendant William Roderick “Roddie” Bryan, by and through undersigned counsel, pursuant to the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution, Article I, Section I, Paragraphs 1,2,11,12,14,16, and 17 of the Constitution of the State of Georgia; Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, 10 L.E.2d 215 (1963); Williams v. State, 250 Ga. 463, 298 S.E.2d 492 (1983), and this court's inherent power to compel discovery, see Hightower v. State, 259 Ga. 770, 386 S.E.2d 509 (1989), and files this his Second Particularized Motion for Discovery of Brady Material, and For Other Relief, and Memorandum of Law In Support Thereof Defendant shows as follows:

1. William Roderick “Roddie” Bryan is incarcerated without bond at the Glynn County Detention Center.
2. Bryan has demanded a speedy trial.
3. Defendant seeks immediate disclosure of any documents, information, facts or other circumstances (including any of such that are intangible but digitally stored) that are exculpatory or might reasonably lead to the discovery of the following exculpatory information:
 - A. Any reason to believe that the Cobb County District Attorney Joyette Holmes, or the Cobb County District Attorney’s office (including any member thereof), harbors any bias or prejudice against Mr. Bryan or undersigned counsel.

B. Any formal or informal agreements, arrangements, deals, or understandings of any kind, whether made directly or indirectly, and whether for cash, in-kind campaign contributions, denial of campaign contributions, endorsements or withholding of endorsements, or other consideration, between Cobb County District Attorney Joyette Holmes (or others acting on her behalf (with or without her advance knowledge)) with the National Association for the Advancement of Colored People (NAACP), Georgia NAACP, Brunswick Chapter of the NAACP, and/or patrons, officers or representatives thereof, whether specifically with respect to the arrest of William Roddie Bryan in connection with the tragic shooting death of Ahmaud Arbery or, more generally, e.g., formal or informal assurances that the State of Georgia would “zealously” prosecute Mr. Bryan specifically and/or others in connection with Mr. Arbery’s death.

4. Defendant notes, in support of this motion, that an anonymous source claiming to be a resident of Cobb County, Georgia has asserted – without disclosing any proof thereof – that there is an improper relationship between Cobb County District Attorney Joyette Holmes and the NAACP that would call into question her objectivity and impartiality in the prosecution of Roddie Bryan.

5. Defendant further notes that Joyette Holmes has been honored by Cobb County NAACP with its “Woman of Achievement” Award, one of many awards and accolades bestowed upon Ms. Holmes by a great many organizations over the years. Joyette Holmes was the guest of honor last year at a gala held by Cobb County NAACP where she was awarded the 2019 Thurgood Marshall Leadership award.

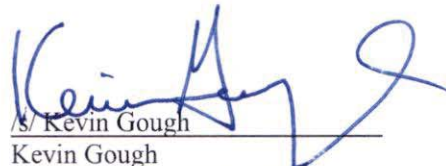
6. Defendant additionally notes that the Georgia NAACP has publicly described the shooting of Ahmaud Arbery as a “modern-day lynching,” and openly and publicly called for the arrest of Roddie Bryan and later referenced that arrest as a “welcome development.” The Brunswick Chapter of the NAACP, with the apparent blessing and support of Georgia NAACP, likewise publicly called for the arrest of Roddie Bryan.

7. Defendant has added these notes so as to further inform the State of Georgia in a more concrete way with respect to the kinds of information, documents and evidence sought by this motion.

8. Undersigned counsel has filed this motion as part of his due diligence in assuring that Mr. Bryan generally receives the due process to which he is entitled and specifically that he receives a fair trial prosecuted by a neutral, detached and impartial prosecutor.

WHEREFORE, Defendant prays that the State be compelled to disclose the information requested above immediately, and in any event prior to bail and preliminary hearings, motions hearings, and trial.

So moved, this 2nd day of June, 2020.

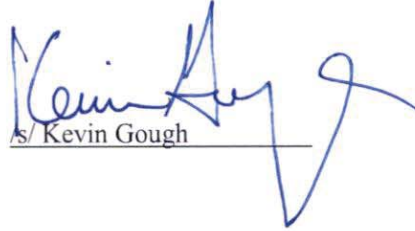

s/ Kevin Gough
Kevin Gough
ATTORNEY FOR DEFENDANT
Georgia Bar No. 303210

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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 2nd day of June, 2020.


s/ Kevin Gough