

Original filed in office this
June 18, 2020
Maisha Houghton
Clerk, Superior Court, Glynn County, Georgia

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.)

**FIRST AMENDMENT TO MOTION FOR DISCLOSURE OF ANY
IMPROPER BIAS OR PREJUDICE, GROUNDS FOR ANY LEGAL CLAIM
OR POSSIBLE BASIS FOR DISQUALIFICATION OF
DISTRICT ATTORNEY, COURT PERSONNEL,
OR OTHER STATE ACTORS INVOLVED IN ANY WAY IN THIS CASE**

COMES NOW Defendant William Roderick Bryan, by and through his attorneys, and moves this first amendment to his previously filed motion for Court for the disclosure of any grounds for any legal claim of any activity which may in any way affect this case or give rise to any legal claim of any improper bias or prejudice or possible basis for disqualification of the District Attorney, her office, court personnel, jury commissioners, law enforcement personnel, or other state actors involved in any way in this case, and of such other information as may be required by the facts and circumstances of this case. This motion is made pursuant to the Fifth, Sixth, and Fourteenth Amendments to the United States Constitution, to Article I, § I, ¶¶ I, II, XII, XIV and XVII of the Constitution of the State of Georgia, and to all other applicable law. This motion is especially important in this case as the Cobb County District Attorney is the **fourth** prosecutor that this case has been assigned to in only three months. Defend amends said motion to add the following additional paragraphs:

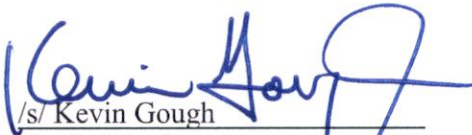
26. The defense also specifically inquires as to whether grounds for disqualification may arise from any financial or other consideration received, agreed to or contemplated by the District Attorney Pro Tempore Joyette Holmes, Assistant District Attorney Jesse Evans, GBI Director Vic Reynolds, Special Agent Richard Dial and Jason Seacrist, and/or others involved in the prosecution of Roddie Bryan including but not limited to any book deals, paid speaking

engagements, or preparatory steps such as the making of diaries or other journals recording in real time events surrounding the prosecution of the case for later commercial use.

27. In so amending this motion, Defendant notes that this morning's google search: "arbery shooting" returned 10.5 million results all of which would have been generated in approximately one hundred days. A contemporaneous search for "Nicole Simpson murder" returned only 6,380,000 results. That alleged murder took place in 1994. Following the "trial of the [20th] Century", lead prosecutor Marcia Clark, assistant Chris Darden and case agent Mark Fuhrman all wrote books about the trial. Even the jury foreperson wrote a book.

28. Beyond the book writing, and speaking engagements, other consideration might include academic positions, judicial or prosecutorial appointments, support for political campaigns for other elected offices, and the like.

So amended, this 18th day of June, 2020.

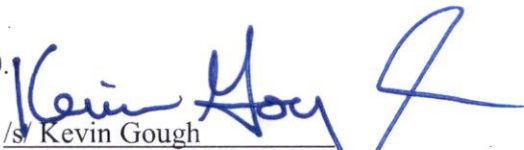

/s/ Kevin Gough
Kevin Gough
ATTORNEY FOR DEFENDANT
Georgia Bar No. 303210

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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.

So amended, this 18th day of June, 2020.


/s/ Kevin Gough