

Randall M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,)
)
)
v.) Criminal Action No. 20-CR-00433
)
WILLIAM RODERICK BRYAN,)
Defendant.)

**MOTION TO DISCLOSE THE PAST AND PRESENT RELATIONSHIPS,
ASSOCIATIONS AND TIES BETWEEN THE PROSECUTION
AND PROSPECTIVE JURORS**

COMES NOW Defendant William Roderick “Roddie” Bryan, by and through undersigned counsel, pursuant to the Fifth and Fourteenth Amendments of the United States Constitution, Article I, Section I, Paragraph I of the Constitution of the State of Georgia, Brady v. Maryland, 373 U.S. 83, 93 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 moves this Court to grant this motion for disclosure and as grounds therefor states the following:

1. This case involves sensitive, emotional issues which will make selection of impartial jurors difficult.
2. This difficulty is compounded by the size of the community and the fact that the Glynn County District Attorney, District Attorney Pro Tempore, Solicitor, and/or other members of the prosecution team and their staff have personal ties with many of the prospective jurors which will impede the jurors' ability to make a fair and impartial determination of the issues.
3. Discovery of religious, social, business, professional, recreational, and political associations, and previous employment by or dealings with any prospective juror or juror's family

as to the criminal justice system, is essential to a thorough voir dire of the jurors and selection of an impartial jury.

4. Prospective jurors are often hesitant to reveal such relationships.

WHEREFORE, Defendant prays that the motion for disclosure be granted along with any further relief the Court may deem appropriate.

So noted, this 16th day of July, 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 16th day of July, 2020.

/s/ Kevin Gough

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