

Randall M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

THE STATE OF GEORGIA	*	CRIMINAL ACTION
V.	*	# CR2000433
TRAVIS MCMICHAEL,	*	
GREG MCMICHAEL, and	*	
WILLIAM BRYAN	*	

STATE'S DISCOVERY DEMANDS

The defendant having requested discovery under O.C.G.A. § 17-16-1, et. seq., or in the event the defendant is allowed additional time to file such a discovery request and elects to do so, the state requests the following reciprocal discovery and any other discovery to which the state may be entitled by law:

DEMAND FOR INSPECTION AND COPYING OF PHYSICAL EVIDENCE

Comes now the state pursuant to O.C.G.A. § 17-16-4 (b)(1) and demands that the defendant produce for the purpose of inspection, copying or photographing, the following which the defendant intends to introduce as evidence in the defendant's case-in-chief or in rebuttal: books, papers, documents, photographs, tangible objects, audio and visual tapes, films and recordings, or copies or portions thereof; and to inspect and photograph buildings or places which are within the possession, custody, or control of the defendant.

The state further demands that the defendant comply within ten days of the state's compliance with the defendant's discovery demand, but no less than five days prior to trial. Upon the failure of the defendant to comply, the state requests that sanctions be imposed as provided in O.C.G.A. § 17-16-6.

DEMAND FOR SCIENTIFIC REPORTS

Comes now the state pursuant to O.C.G.A. § 17-16-4 (b)(2), and demands that the defendant produce for the purpose of inspecting and copying or photographing any results or reports of physical or mental examinations and of scientific tests or experiments, including a summary of the basis for the expert opinion rendered in the report, or copies thereof, within the possession or control of the defendant and which the defendant intends to introduce as evidence in the defense's case-in-chief or rebuttal.

The state further demands that the defendant comply within ten days of the state's compliance with the defendant's discovery demand, but no less than five days prior to trial. Upon the failure of the defendant to comply, the state requests that sanctions be imposed as provided in O.C.G.A. § 17-16-6.

DEMAND FOR WITNESS STATEMENTS

Comes now the state pursuant to O.C.G.A. § 17-16-7, and demands that the defendant produce any statement of any witness that is in the possession, custody, or control of the defendant or the defendant's counsel, that relates to the subject matter concerning the testimony of a witness the defense intends to call as a witness at trial or at defendant's post-indictment pre-trial evidentiary hearing.

The state further demands that the defendant comply no later than ten days prior to trial or at the time of any pretrial evidentiary hearing other than a bond hearing. Upon the failure of the defendant to comply, the state requests that sanctions be imposed as provided in O.C.G.A. § 17-16-6.

DEMAND FOR LIST OF WITNESSES AND WITNESS INFORMATION

Comes now the state pursuant to O.C.G.A. § 17-16-8, and demands that the defendant produce the names, current locations, dates of birth, and telephone numbers of the defendant's witnesses.

The state further demands that the defendant comply within ten days of the state's compliance with the defendant's discovery demand, but no less than five days prior to trial. Upon the failure of the defendant to comply, the state requests that sanctions be imposed as provided in O.C.G.A. § 17-16-6.

DEMAND FOR REIMBURSEMENT

Pursuant to the authority of O.C.G.A. § 17-16-9, the state hereby moves that this Court order that the defendant reimburse the state for the actual costs incurred in providing documents and other material to the defendant as part of its compliance with the defendant's motions for discovery.

Pursuant to O.C.G.A. § 17-16-1 et. seq., the defendant's duty to comply with discovery is continuing. If at any time the defendant discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection under this article, the defendant is under a duty to promptly notify the state of the existence of the additional evidence or material and make this additional evidence or material available as provided in this article.

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of: **STATE'S DISCOVERY DEMANDS** by hand delivery or by placing a copy in the United State's mail in a properly addressed envelope with adequate postage thereon to:

Mr. Robert G. Rubin
Mr. Jason B Sheffield
2786 North Decatur Road
Suite 245
Decatur, GA 30033

Mrs. Laura Hogue
Mr. Frank Hogue
341 Third Street
P.O. Box 1795
Macon, GA 31202

Kevin Gough
501 Gloucester Street
Suite 121
P.O. Box 898
Brunswick, GA 31521

This 21ST day of July, 2020.

/S/ Jesse Evans
JESSE EVANS
Deputy Chief Assistant District Attorney
Cobb Judicial Circuit
GA State Bar # 252342