

Ronald M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,)
)
)
v.) Criminal Action No. CR-2000433
)
)
WILLIAM RODERICK BRYAN,)
Defendant.)

MOTION TO AMEND SCHEDULING ORDER
RESPONSE TO CO-DEFENDANTS' MOTION TO AMEND

Comes now Defendant William Roderick “Roddie” Bryan, by and through undersigned counsel, pursuant to the Fifth and Fourteenth Amendments to the United States Constitution, Article I, Section I, Paragraphs I of the Constitution of the State of Georgia; and this Court's inherent powers, and other applicable law, and files this his “Motion to Amend Scheduling Order and Response to Co-defendants’ Motion to Amend.” Defendant Bryan seeks a **thirty day (30) extension** of time within which defendants shall provide reciprocal discovery, noting that voluminous additional discovery was furnished by the State on August 24, 2020 and that defendants are generally entitled, both by custom and statute, to a reasonable period of time to digest the State’s discovery before providing reciprocal discovery.

Defendant Bryan is sensitive to the desire of the McMichael defendants and their counsel to have additional time. At this time, however, Defendant contends that any further generic extension of the time within which to provide reciprocal discovery beyond thirty days would be premature. If it turns out to be necessary, a more particularized and limited extension might be sought at a later date.

Defendant generally opposes any substantial and generic extension of time within which to file defense motions or conduct hearings, including the lengthy extension sought by the McMichael defendants. Defendant generally opposes any scheduling order or amendment thereto to the extent that same would constitute a formal or de facto waiver of Defendant Bryan’s speedy trial rights under state or federal law.

Defendant specifically objects to the time frame within which the State must respond to motions filed by the defense. Responses should be filed within thirty days, if responses are required, allowing the Court to schedule motions hearings without undue delay. Defendant objects to the current scheduling order to the extent that it effectively prevents the court from addressing the bulk of the motions filed or to be filed in this case in the current calendar year, and thereby effectively deferring the trial of this case well into 2021.

WHEREFORE, Defendant prays that the Court grant the relief requested herein.

So moved, this 28th day of August, 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

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 28th day of August, 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