

1 IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR MARION COUNTY

2)
3 State of Oregon,
Plaintiff.

4 vs.

5]
6 Defendant.

CASE NO. :

FORMAL REQUEST TO DISCLOSE
DISCOVERY AND OBJECTION TO
ANALYTICAL REPORT

7 This is a request for discovery in the case referenced above. Pursuant to ORS 135.815 and
8 ORS 135.845, please provide the following:

9 1. The names and addresses of persons whom you intend to call as witnesses, together with any
10 written or recorded statements or memoranda of any oral statements of such persons.

11 2. All written or recorded statements or memoranda of any oral statements made by the above
12 named defendant or by any co-defendant(s). We also require any record of prior criminal
13 convictions of any persons you intend to call as witnesses, and any prior criminal record of the
14 above named defendant.

15 3. Any reports or statements of experts made in connection with this case, including the results
16 of any physical or mental examinations, or any scientific tests, experiments or comparisons
17 which are intended to be offered in evidence for any reason, including at trial. **The defendant**
18 **objects to the introduction during trial of any analytical report that might be introduced**
19 **pursuant to ORS 475.235(4).**

20 4. Any books, papers, documents, photographs, video images, other digital images or tangible
21 objects which are intended to be offered at trial, or were obtained from or belong to the above
22 named defendant.

23 5. All original notes or reports of the arresting officer in this case.

24 6. The occurrence of a search or seizure, the circumstances of those activities, any relevant
25 material or information obtained thereby, and the precise circumstances surrounding the
26 acquisition of any statements made to any member of any law enforcement agency, or to any
27 personnel of the District Attorney's office.

1 7. Defendant specifically requests copies of any photographs, video, or audio recordings
2 taken or obtained by the police in the course of investigating this case.
3

4 Please instruct all law enforcement officers, as well as personnel of the District Attorney's
5 office, NOT to communicate with the above named defendant without first obtaining written
6 permission from the Public Defender attorney referenced above.

7 DATED:

5-10-18

8
9
10 _____
Jr.
Attorney For Defendant

11 PROOF OF SERVICE

12 The UNDERSIGNED CERTIFIES that the Marion County District Attorney was served with
13 a copy of the attached document(s):
14

15 Formal Request to Disclose Discovery and Objection to Analytical Report

16 by hand delivering or causing to be hand delivered a certified-to-be-true Copy to the Marion
17 County District Attorney, 555 Court Street NE, Salem, OR 97301.

18 DATED:

5-10-18

19
20 BY:
21 _____
22
23
24
25
26

THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

STATE OF OREGON
Marion County Circuit Courts
JUL 12 2018
FILED

CASE NO. _____

State v. _____

I acknowledge that I have been directed by the Court to appear for Court on the above-entitled matter on the _____ day of July, 2018, at 1:30 am/pm: (p)

- Marion County Courthouse; 100 High St. NE, Salem
- Court Annex, 4000 Aumsville Hwy., Salem

Dated this 12th day of June, 2018.

Signature of Defendant

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

STATE OF OREGON
Marion County Circuit
JUL 18 2018
FILED

CASE NO. _____

State v. _____

I acknowledge that I have been directed by the Court to appear for Court on the above-entitled matter on the 21st day of August, 2018, at 1:30 am/pm.

Marion County Courthouse; 100 High St. NE, Salem

Court Annex, 4000 Aumsville Hwy., Salem

Dated this 18 day of July, 2018.

Signature of Defendant

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

STATE OF OREGON
Marion County Circuit Courts
AUG 29 2018
FILED

CASE NO. _____

State v. _____

I acknowledge that I have been directed by the Court to appear for Court on the above-entitled matter on the 4th day of October, 2018, at 1:30 am/pm.

Marion County Courthouse; 100 High St. NE, Salem

Court Annex, 4000 Aumsville Hwy., Salem

Dated this 29th day of August, 2018

Signature of Defendant