

IN THE DISTRICT COURT OF LOVE COUNTY  
STATE OF OKLAHOMA

State of Oklahoma, )  
Plaintiff, )  
Vs. )  
Marion Joe Russell, )  
Defendant. )

Case No. CF-16-194

Filed in District Court  
Love County, OK

AUG 01 2016


Kim Jackson, Court Clerk  
By \_\_\_\_\_

**DEFENDANT'S DISCOVERY REQUEST**

COMES NOW Marion Joe Russell, the accused, and hereby requests that the plaintiff provide the following items pursuant to 22 O.S. § 2002 and the discovery rules of the Court of Criminal Appeals adopted in *Allen v. District Court of Washington County* 803 P.2d 1164.

- a. The names and addresses of witnesses the plaintiff intends to call at trial, together with their relevant, written or recorded statement, if any, or if none, significant summaries of any oral statement;
- b. law enforcement reports made in connection with the particular case;
- c. any written or recorded statements and the substance of any oral statements made by the accused;
- d. any audio or video recordings of the accused;
- e. any reports or statements made by experts in connection with the particular case;
- f. any books, papers, documents, photographs, tangible objects, which the prosecuting attorney intends to use in the hearing or trial or;
- g. Rap sheet/records check on any witness listed by the plaintiff.
- h. Further, the defendant requests plaintiff provide any statements or other evidence favorable to the defendant.

DATED this 26 July 2016.

  
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(580) 276-6151  
gary.brown1190@gmail.com  
Attorney for Marion Joe Russell

**CERTIFICATE OF MAILING**

I hereby certify that on 27 July 2016, I emailed a true and correct copy of the above and foregoing Discovery Request to Kathryn R. Savage, Assistant Attorney General at [Kathryn.Savage@oag.ok.gov](mailto:Kathryn.Savage@oag.ok.gov) and Sean Hill, Assistant Attorney General at [Sean.Hill@oag.ok.gov](mailto:Sean.Hill@oag.ok.gov).

  
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Gary R. Brown