

Ronald M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA

STATE OF GEORGIA :
 :
v. : INDICTMENT NO.
 : CR-2000433
TRAVIS MCMICHAEL, :
 :
GREG MCMICHAEL, :
 :
Defendants. :

1.5
MOTION TO AMEND SCHEDULING ORDER

Defendants GREG McMICHAEL and TRAVIS McMICHAEL move this court to amend its Scheduling Order, entered on July 17, 2020, in the following ways:

Amend the defendants' deadline to provide their reciprocal discovery to the State from August 28, 2020, to November 30, 2020.

Amend the defendants' deadline to file pre-trial motions from September 30, 2020, to December 31, 2020.

In support of these amendments, the defendants offer the following:

1.

The State provided its first round of discovery to the defendants during the week of July 19, 2020. That first round consisted of 47.3 GB,

which was divided among documents (1,635 pages) and media, which consisted of video interviews, police body camera videos, and cellphone extraction reports (489 media files).

2.

The State will provide a second round of discovery consisting of about 260 GB of data within the next day or so.

3.

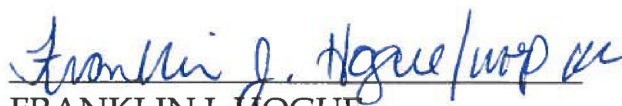
In order to prepare the discovery the defendants will provide to the State under their reciprocal obligations, the defense must review, analyze, discuss with their clients, and investigate the State's case. Only then will the defense be in the proper position to make important decisions about their witnesses and exhibits, complete their own interviews, and gather those exhibits for presentation to the State. Given the size of the State's discovery, the impediments faced by the current pandemic, and the stakes involved in this case, the defense estimates the need for an extension of time to November 30, 2020, roughly an additional 90 days, to complete this work.


4.

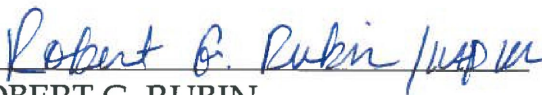
The defendants request an additional month after that, to December 31, 2020, to complete any pre-trial motions research and drafting suitable to the specific facts and legal issues involved in this case. While some of that work will occur as the defense reviews and analyzes the State's discovery, some of it may turn on what evidence the defendants believe should be admitted in its case-in-chief.


For these reasons, the McMichaels move this court to amend its Scheduling Order to move the deadline for the defendants' discovery to the State to November 30, 2020, and the deadline for filing pre-trial motions to December 31, 2020.

August 24, 2020.


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Certificate of Service

I hereby certify by my signature that I have served a copy of the 1.5 Motion to Amend Scheduling Order on the Office of the District Attorney for the Cobb Judicial Circuit by delivering it to District Attorney Joyette Holmes by emailing it to:

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