

*Ronald M. Adams*  
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA, )  
 )  
 )  
 v. ) Criminal Action No. CR2000433  
 )  
 WILLIAM RODERICK BRYAN, )  
 Defendant. )

**THIRD REQUEST FOR HEARING**  
**AMENDED MOTION FOR RECONSIDERATION OF BOND**

COMES NOW Defendant, William Roderick Bryan, by and through undersigned counsel, and files this his THIRD Request for Hearing and Amended Motion for Reconsideration of Bond. Roddie Bryan had a bond hearing in July, based on the limited evidence available at that time, during which it is respectfully submitted that the State of Georgia stretched the truth to the breaking point and made several representations to the court that have not stood the test of time.

The suggestion for example, repeated in the State's bizarre written response opposing Mr. Bryan's request for example, that Roddie Bryan had "no substantial ties to the community" was so plainly contradicted by the record and reality as to be almost Orwellian, or Kafka-esque, especially since it was his very arrest that precipitated the loss of his home and real property in Glynn County, Georgia, where he has been a resident virtually his entire life (and even then just across the county line in neighboring Camden County, Georgia). He is a product of the Glynn County School system, so famously maligned by undersigned counsel on national television earlier this year. Additional evidence is available, and has been available for some time, as referenced in the motion filed in OCTOBER. The State of Georgia offers no cogent reason why the Court should not consider such evidence nor other rationale for its extraordinary opposition to this motion.

These defendants remain the only individuals to be denied bond in any of these high profile, racially charged cases. As someone unarmed, clearly at a considerable distance from Ahmaud Arbery at the time of his death, and without any history of violence or any other felony, Roddie Bryan is indisputably the least culpable person charged in any of these cases.

As they say, no good deed goes unpunished. Without Roddie Bryan, as the body cameras and other evidence make clear, many details with respect to the tragic shooting death of Ahmaud Arbery would have been lost forever. Instead of acknowledging that Mr. Bryan did the right thing on the day in question, and in the days and months that followed – fully cooperating with law enforcement so that justice could be determined (whatever that may look like) – the State of Georgia continues with each passing day that he is denied bond to inflict further injustice upon him.

Pre-trial detention has been very difficult for Mr. Bryan. He continues to ~~continues to~~ suffer from uncontrolled high blood pressure. On Wednesday, after his blood pressure had not been checked for approximately ten days (for reasons that are unclear), medical staff at Glynn County Detention Center recorded a blood pressure reading of 201/114. Having been unable to bring his blood pressure under control, Mr. Bryan has now been prescribed a sedative, or tranquilizer, in an effort to reduce anxiety. Such medications have their own side effects.

The eyes of a weary nation are on Georgia, and its criminal justice system, wondering whether in this racially charged atmosphere, and political climate, a white person accused of a crime of violence against a black person can still receive a fair trial in the Georgia courts. The inability of Mr. Bryan even to obtain a hearing on his second motion for bond does little to encourage Mr. Bryan or his family and friends – or the community at large – that the Georgia courts are up to the challenge but time will tell.

WHEREFORE, Defendant again requests that the above-referenced motion be set down for evidentiary hearing *instanter*.

Respectfully submitted this the 12<sup>th</sup> day of January, 2021.

/s/ Kevin Gough  
Kevin Gough  
ATTORNEY FOR DEFENDANT  
Georgia Bar No. 303210

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**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.

Respectfully submitted this the 12<sup>th</sup> day of January, 2021.

/s/ Kevin Gough  
ATTORNEY FOR DEFENDANT