

Russell M. Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA

*

V.

*

Indictment:

*

CR 2000433

*

TRAVIS MCMICHAEL

*

GREG MCMICHAEL

*

WILLIAM R BRYAN

*

2.3

STATE'S RESPONSE TO DEFENDANT'S DISCOVERY MOTION

The State has made an effort, since January 19, 2020, to coordinate with the attorneys for Greg McMichael in addressing this motion. The State specifically selected Laura Hogue for contact, since she signed the motion, but understands that Travis McMichael filed this motion jointly with Greg McMichael, and that William Bryan joined in the motion. The State wants to ensure that the defense has everything listed in their motion, or an explanation as to why a folder is empty, what may be forthcoming or how to play certain videos.

At this time, the State has been directed to coordinate with a paralegal for the Hougues to specifically review the discovery issues listed in Motion 2.3. The State will continue its efforts to set up a Zoom conference, with all defense teams. This is so that the defense may screen-share, with the State, the specific folders or items with which they are having problems, as it is easier to address the issue when one can see it visually, rather than trying to go by written descriptions. This will also allow the defense to have an immediate response, and demonstration, when appropriate, limiting the back and forth through written motions and descriptions.

Assistant District Attorney Pro Tempore Norman Barnett will be the point person on this, in coordination with Investigator Prescott and Investigator Watson.

This the 27th day of January, 2021.

/S/ Linda J. Dunikoski

Linda J. Dunikoski
State Bar # 233887
Senior Assistant District Attorney
District Attorney Pro Tempore
Cobb Judicial Circuit

/S/ Norman Barnett

Norman Barnett
State Bar # 153292
Senior Assistant District Attorney
District Attorney Pro Tempore
Cobb Judicial Circuit
770-528-3080
norman.barnett@cobbcounty.org

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served opposing counsel with a true and correct copy of the above State's Response to Defendant's Discovery Motion via the Odyssey E-File System to:

Mr. Robert G. Rubin
Peters Rubin Sheffield & Hodges, PA
2786 North Decatur Road Suite 245
Decatur, GA 30033
robertrubin@justiceingeorgia.com
jasonsheffieldattorney@gmail.com
(404) 296-5300

Laura and Frank Hogue
Hogue & Hogue LLP
341 Third Street
PO Box 1795
Macon, GA 31202-1795
(478) 750-8040
laura@hogueandhogue.com
frank@hogueandhogue.com

Mr. Kevin Robert Gough
Kevin Gough Firm LLC
PO Box 898
Brunswick, GA 31521
kevingough.firm@gmail.com
(912) 242-5114

This the 27th day of January, 2021.

/S/ Linda J. Dunikoski
Linda J. Dunikoski
Senior Assistant District Attorney
State Bar # 233887
District Attorney Pro Tempore
Cobb Judicial Circuit
70 Haynes Street, Marietta, GA 30090
Tel. (770) 528-3080
Linda.Dunikoski@CobbCounty.org