

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

*

4.3

STATE'S RESPONSE TO DEFENDANTS MOTION IN LIMINE
TO LIMIT QUANTITY AND CONTENT OF "IN LIFE" PHOTOGRAPHS
AND TO RESTRICT THE MANNER OF INTRODUCTION

The State intends on tendering into evidence one "in life" photo of Ahmaud Arbery. However, should it become necessary to introduce additional photos of Mr. Arbery, the State will seek to introduce such relevant photos. An example of such an instance would be photos of Arbery jogging or in his usual running attire to rebut the defendant's assertion, if any, that he was not really an avid runner.

The defendants also motion to have the "in life" photo of the victim, Ahmaud Arbery, introduced into evidence by a non-related witness. The State will make every effort to do so, and therefore, will expect no objection when a non-family member identifies the in-life photo.

This the 29th 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

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 4.3 STATE’S RESPONSE TO DEFENDANTS MOTION IN LIMINE TO LIMIT QUANTITY AND CONTENT OF “IN LIFE” PHOTOGRAPHS AND TO RESTRICT THE MANNER OF INTRODUCTION 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 29th 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