

Russell M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA

V.

TRAVIS MCMICHAEL
GREG MCMICHAEL
WILLIAM R BRYAN

*
* Indictment:
* CR 2000433
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4.2

STATE'S RESPONSE TO DEFENDANTS MOTION TO ADOPT CO-
DEFENDANT'S OBJECTIONS AND ARGUMENTS

The State objects to the defendants' motion to adopt the objections, and argument in support of the objections, made by any co-defendant during the trial of this case. There are only three co-defendants. It is a simple matter for the other two defendants to state that they join in any particular objection and argument, at the appropriate time, thus making a good record for appeal, if necessary. This will also avoid any assertion, upon appeal, that defendants T. McMichael and G. McMichael were operating under a conflict of interest, or that one set of attorneys did not advocate zealously for their client.

As noted in their motion, the defendants fully intend on adding to or supplementing the argument of any co-defendant, and thus, there is no real benefit to this proposed procedure, since the Court will likely hear from at least two attorneys on every objection or motion.

The State also objects to this procedure applying to the State. Not all objections by the State are going to apply to all defendants. An example would be when the State objects to the form of a question during cross-examination by one defendant.

Therefore, the State requests that the Court DENY the defendant's Motion and require each defendant to individually and independently join into the objection and argument on the record.

This the 29th day of January, 2021.

/S/ Jesse Evans

JESSE EVANS

State Bar # 252342

Deputy Chief Assistant District Attorney

District Attorney Pro Tempore

Cobb Judicial Circuit

/S/ Linda J. Dunikoski

Linda J. Dunikoski

State Bar # 233887

Senior Assistant District Attorney

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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 4.2 STATE'S RESPONSE TO DEFENDANTS MOTION TO ADOPT CO-DEFENDANT'S OBJECTIONS AND ARGUMENTS via the Odyssey E-File System to:

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This the 29th day of January, 2021.

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