

*Ronald M Adams*  
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA

\*

V.

\*

Indictment:

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CR 2000433

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TRAVIS MCMICHAEL

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GREG MCMICHAEL

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WILLIAM R. BRYAN

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2.3

STATE'S SUPPLEMENTAL RESPONSE TO DEFENDANT'S  
DISCOVERY MOTION

Assistant District Attorney Pro Tempore Norman Barnett met with representatives of defense counsel via Zoom video conferencing on Thursday, February 11, 2020. This video conference was conducted in order to address the specific discovery issues encountered by the defense and listed in their Motion 2.3. Many of the issues encountered by the defense were addressed during the conference call. The State has continued to work with the defense to ensure that they are able to access the electronic discovery. The following are the specific responses.

a) File "2020FED19/0730A – PARKER'S CONVENIENT STORE ARBURY" is not an attachment or link to a file. It is text of the tip received by LE.

b) Black Thumb Drive (3) subfolder 001122 – these are the photos taken in conjunction with the Leica scan (see that they are labeled per "Station"). They are preserved in two ways: jpeg images and .bin files (which are binary files holding data that support the use of the jpeg images in the Leica program). In other words, we are not meant to "open" the .bin files – they are support files.

c) This is the Leica 3D scanner file. The State and the defense met on May 14, 2021 with S.A. Smith of the GBI and reviewed these files.

d) Evidence: docattach508283 inside the folder summattach768767 (this is the .zip of Defendant Bryan's Facebook social media account – which was subsequently served upon the defense August 19, 2020) and folder summattach 767228 (which are the 25 drone videos that have been served on the defense).

e) Defense has received a copy of “Roddy Phone” in a folder titled “William Bryan Cell Phone Download” – this was provided in the 7/20/2020 discovery disclosure.

f) The State has confirmed that “Black Thumb Drive (2)” is an empty folder, inadvertently created. In other words, the defense is not missing anything.

g) Defense counsel resolved this issue regarding the playing of the .mov files.

#### Additional Missing/ Problem Attachments from GBI File

GBI Exhibit 38 – Password is in the report on page 82.

GBI Exhibit 92 – The report indicates that “records 107 and 185” of the voice call log from the extraction, are 911 calls. The calls themselves were not attached to the exhibit. The exhibit only consists of screen captures from the call logs.

GBI Exhibit 101 – All four of these files are a problem. There are several glitches. The GBI has subsequently extracted the files directly from Bryan's DVR and they were served in Discovery #10 (AA05978 DVR Videos).

GBI Exhibit 116 – Bryan's Facebook download was provided on “Black Thumb Drive 1” in the discovery served on August 19, 2020.

GBI Exhibit 377 – This exhibit number was skipped by mistake due to a clerical error. There is no Exhibit 377.

GBI Exhibit 405 – This exhibit number was skipped by mistake due to a clerical error. There is no Exhibit 405.

GBI Exhibit 409 – According to S.A. Dial, if the report from this incident exists, it would have been pulled by the GBI and provided in discovery.

GBI Exhibit 508 – The GBI drone videos taken by S.A. Smith on May 26, 2020 at 3:00 p.m. were provided in “GBI Region 14 Flashdrive 3.” Confirmed with S.A. Dial that the drone videos provided are the drone videos referenced in the report in Exhibit 508.

GBI Exhibit 516 – Information in the state’s possession regarding the Walmart shoplifting incident has been provided.

GBI Exhibit 543 – This exhibit is a review by S.A. Dial of the 911 calls received in Exhibit 536. These calls were attached in Summattach766814.

GBI Exhibit 550 - This exhibit number was skipped by mistake due to a clerical error. There is no Exhibit 550.

GBI Exhibit 565 – Per S.A. Dial, the information referenced in this Exhibit was provided to the GBI by the FBI. The GBI provided what they have. The interview was conducted by Mr. Perras and is the “Fogarty Interview.”

This the 16th day of June, 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 State's Supplemental Response to Defendant's Discovery Motion via the Odyssey E-File System to:

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This the 16th day of June, 2021.

*/S/ Linda J. Dunikoski*  
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