

*Randall M Adams*  
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA :  
 :  
v. : INDICTMENT NO.  
 : CR-2000433  
TRAVIS MCMICHAEL :  
 :  
GREGORY MCMICHAEL, :  
 :  
Defendants. :  
 :

**5.4**  
**DEFENDANTS' MOTION FOR**  
**ADDITIONAL PEREMPTORY STRIKES**

Travis and Greg McMichael, defendants in the above-styled case, move this Court for additional strikes with which to exercise their peremptory challenges. In support of this motion, the McMichaels submit the following:

Travis McMichael, Greg McMichael, and William Bryan are scheduled for trial beginning October 18, 2021. Under the law, the defendants are entitled to a total of nine peremptory challenges, with said challenges to be used jointly or apportioned by the Court. O.C.G.A. §§ 15-12-165 and 17-8-4(b). However, under O.C.G.A. § 17-8-4(b), "In the event two or more defendants are tried jointly, the court, upon request of the

defendants, shall allow an equal number of additional strikes to the defendants, not to exceed five each, as the court shall deem necessary, to the ends that justice may prevail....”

Given the number of defendants and the extensive media coverage of this case and the defendants, as well as the difference in the sort of defense case that must be tried by co-defendant Wiliam Bryan (likely prompting the need to exercise some strikes differently from the McMichaels), this is the type of case where it is necessary for the Court to provide defense counsel with additional peremptory strikes. We request that the Court exercise its discretion and grant each defendant an additional 5 peremptory challenges that the defendants will exercise jointly.

This 14th day of July, 2021.

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**Certificate of Service**

I hereby certify by my signature that I have served a copy of **5.4 Defendants' Motion for Additional Peremptory Strikes** on the Office of the District Attorney for the Cobb Judicial Circuit by delivering it to District Attorney Flynn D. Broady, Jr., by emailing it to:

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July 14, 2021.

s/Robert G. Rubin  
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