

Altioirem Legal Services, PLLC
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Attorney for Defendant

IN THE THIRD JUDICIAL DISTRICT COURT, SALT LAKE DEPARTMENT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

THE STATE OF UTAH,

Plaintiff,

v.

ANDREW ADAMS,

Defendant.

**NOTICE OF APPEARANCE OF
COUNSEL AND REQUEST FOR
DISCOVERY**

Case No. 987654321
Judge: Porter Williams

Saul Goodman, of and for the law firm Altioirem Legal Services, PLLC, hereby enters his appearance as counsel for the above-named Defendant, Andrew Adams, in the above-captioned case.

Defendant, by and through his counsel of record, hereby requests disclosure and production of the materials and information listed below, within fifteen days of the date of delivery of this request:

1. Any and all property seized, namely:
 - a. 1 ski hood
 - b. 1 size XXL windbreaker jacket
 - c. 1 pair generic sunglasses
 - d. 4 XBOX 360 games still in packaging
 - e. 1 small clear plastic bag w/ leafy residue inside

2. Any and all police reports, supplemental reports or the like made in conjunction with this case.
3. Any and all pre-booking, booking, or post booking reports or supplements regarding this defendant.
4. Any and all citations or tickets issued in this matter.
5. Any and all statements, oral, written or otherwise recorded or preserved in any manner, attested to, signed by or not, alleged to have been made by the defendant to any person at any time regarding the facts or circumstances of this case.
6. Any and all names, addresses and phone numbers of any persons who may be called to testify against Defendant at trial or any other hearing on issues related to this case.
7. Any and all statements made by any of the aforementioned witnesses, oral or written, recorded in any manner, attested to or signed or not by them.
8. Any and all names, addresses and phone numbers of any percipient witnesses to any aspect of the offense, investigation or analysis conducted in this case, whether favorable or unfavorable to the defense, regardless of the prosecution's intent to call these persons as witnesses.
9. Any and all statements made by any of the aforementioned witnesses, oral or written, recorded in any manner, attested to or signed, or not, by them.
10. Any and all audio or visual recordings of the Defendant, the scene, or any other facts or circumstances related to the above offense however recorded and maintained.
11. Any and all criminal records allegedly relating to this Defendant.

12. Any and all criminal records of witnesses the prosecution intends to call at trial or hearing, whether felony or misdemeanor, and the probation status, if any, of these persons or any other relevant impeachment material of a witness.

13. Any and all other favorable or exculpatory evidence, information, and documents, in the possession of the District Attorney, any police department, or other agency or person available to the prosecution through due diligence.

14. Any and all tapes, printouts, or other communication from any police, fire, or other dispatch regarding this offense.

15. Any and all recordings, printouts or other memorializations of any point to point communication by any person involved in this matter.

16. Any and all 911 or other calls to the police regarding this matter however recorded or preserved.

17. Notice is hereby given that the defense requests any and all original tapes of communication regarding this event be preserved for inspection.

18. Notice is hereby given that failure to produce the above items will result in application for judicial notice of the requested information and standards applicable thereto.

19. Defendant requests that this document be treated as a continuing request through the completion of trial.

DATED this 22nd day of February of 2018.

Altioem Legal Services, PLLC

/s/ Saul Goodman
Saul Goodman,
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2018, I caused to be served, via electronic filing and U.S. Mail, a true and correct copy of the foregoing Notice of Appearance of Counsel and Request for Discovery, upon:

Salt Lake District Attorney's Office
111 E. Broadway, #400
Salt Lake City, UT 84111

Clerk of the Court
Third District Court
450 South State Street
Salt Lake City, UT 84111

/s/ Saul Goodman

SAMPLE
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