

STATE OF NORTH CAROLINA
COUNTY OF GUILFORD

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

FILED

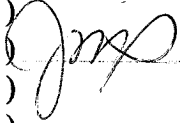
97CRS39581
97CRS23656

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STATE OF NORTH CAROLINA

GUILFORD COUNTY, C.S.C.

v.

BY 
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)

MOTION FOR
RECIPROCAL DISCOVERY
N.C.Gen.Stat. 15A-905

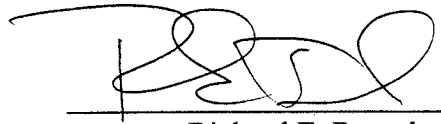
THEODORE MEAD KIMBLE,
Defendants

The State of North Carolina having complied with the Defendant's request for voluntarily discovery, and having made a request for voluntary reciprocal discovery, hereby **MOVES** the Court to enter an order pursuant to N.C.Gen.Stat. 15A-905(a) requiring the Defendant to allow the State of North Carolina to inspect and copy all:

1. Documents and Tangible Objects. (books, papers, documents, photographs, electronic recordings) which are within the possession, custody, or control of the defendant and which the defendant intends to introduce in evidence at the trial.
2. Documents and Tangible Objects. (books, papers, documents, photographs, electronic recordings) which are within the possession, custody, or control of the defendant's private investigator and which are the basis of the testimony or said investigator.
3. Reports of Examinations and Tests, including the results or reports of physical or mental examinations or tests which the defendant intends to introduce in evidence at the trial or which were prepared by a witness whom the defendant intends to call at the trial, when the results or reports relate to his testimony.
4. All Reports of Examinations and Tests as set forth in paragraph 3 which the defendant intends to introduce at phase two of this trial.
5. All previously sealed ex-parte orders which appointed experts to the defendant unless the defendant does not plan to call that expert as a witness and will not use the reports generated by said expert.
6. Physical evidence or a sample of it available to the defendant if the defendant intends to offer such evidence, as an exhibit or evidence in the case.

Further, the State of North Carolina, requests that the court require that said reciprocal discovery be provided to the State of North Carolina no later than June 1, 1998 to allow the State of North Carolina to evaluate the discovery prior to the trial date of August 2, 1998. Pursuant to State v. Goodwill, 336 N.C. 499 (1994), the court has the authority to set reasonable deadlines for reciprocal discovery. .

This Friday, May 01, 1998.

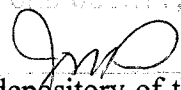


Richard E. Panosh
Assistant District Attorney

CERTIFICATE OF SERVICE

FILED

I, Richard E. Panosh, Assistant District Attorney for the Eighteenth Prosecutorial District, hereby certify that I have served a copy of the attached document on the counsel for the Defendant this date by:

FILED
MAY 01 1998
U.S. DISTRICT COURT, C.S.C.
BY 

- () Placing said copy in an official depository of the United States Post office with the first-class postage prepaid and with the same addressed to:


Mr. John B. Hatfield
Attorney at Law
Hatfield and Hatfield
219 West Washington St.
Greensboro, NC 27401

Mr. W. David Lloyd
Attorney at Law
Suite 301
101 South Elm St.
Greensboro, NC 27401

Mr. John Bryson
Attorney at Law
Wyatt Early Harris & Wheller, L.L.P.
Suite 400
1912 Eastchester Drive
High Point, NC 27265

Mr. Robert McClellan
Attorney at Law
Ivey, McClellan, Gatton & Talcott, L.L.P.
P.O. Box 3324
Greensboro, NC 27402-3324

This Friday, May 01, 1998.


Richard E. Panosh,
Assistant District Attorney