

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

THE STATE OF UTAH,

Plaintiff,

-vs-

SHAWN CHRISTOPHER RICKS,

Defendant.

STATE'S MOTION TO DISCOVER

Case No. 141911789FS

Judge Katherine Bernards-Goodman

Pursuant to Rule 16(c) of the Utah Rules of Criminal Procedure, JARED W. RASBAND, attorney for plaintiff, moves this Court for an Order requiring the defendant to make available to the prosecutor the following items in order for the State of Utah to adequately prepare its case. See also Taylor v. Illinois, 484 U.S. 400, 98 L.Ed.2d 798, 98 L.Ed.2d 798 (1988); United States v. Nobles, 422 U.S. 225, 45 L.Ed.2d 141, 95 S.Ct. 2160 (1975); United States v. Nixon, 418 U.S. 683, 41 L.Ed.2d 1039, 94 S.Ct. 3090 (1974); State v. Spry, 2001 UT App 75; and State v. Carter, 707 P.2d 656 (Utah, 1985).

1. A list of all the witnesses that the defense intends to call for trial in the above-entitled matter, their addresses, telephone numbers, and dates of birth.
2. An opportunity for the prosecutor to inspect physical evidence, documents, and photographs the defendant intends to introduce at trial.

3. Copies of any reports and conclusions of any experts that the defendant intends to call for trial, each expert's qualifications and information concerning any remuneration that the witness may be receiving for such testimony.

4. Copies of any reports prepared by defense investigators during the course of the prosecution of this case.

5. Copies of any reports prepared by defense investigators where the defense intends to call the particular investigator as a witness.

5. Copies of any portion of any reports prepared by defense investigators concerning statements made by witnesses the defense intends to call at trial.

6. Disclosure of any relationship to the defendant of any witness the defense intends to call at trial.

7. Any transcript prepared of hearings held in this case which the defendant intends to use at trial.

8. Any evidence the defense will seek to introduce at trial under Rule 404 of the Utah Rules of Evidence.

DATED this 25th day of March, 2015.

SIM GILL
District Attorney for Salt Lake County

/s/ Jared W. Rasband

JARED W. RASBAND
Deputy District Attorney