

<input type="checkbox"/> District Court <input type="checkbox"/> County Court			
		County, Colorado	
Court Address:			
STATE OF COLORADO Plaintiff(s)/Petitioner(s)		↑ COURT USE ONLY Case Number: 05-27364	
v. Michael D. Williams Defendant(s)/Respondent(s)		Division:	Courtroom:
NOTICE OF SPECIAL APPEARANCE AND DEMAND FOR DISCOVERY			

TO: Clerk of the Court County of EL PASO and

TO: Prosecuting Attorney County of EL PASO

PLEASE TAKE NOTICE that I Michael D. Williams hereby enter this notice of Special Appearance as the accused/Defendant in this cause. Defendant requests a bill of particulars pursuant to CRCP 7.9, and further makes the following demand for discovery:

1. The names, addresses, and phone numbers of all persons the prosecutor intends to call as witnesses at the time of hearing or trial, together with copies of any notes, written or recorded statements, and the substance of any oral statements made by any of those witnesses or by any third parties communicated to those witnesses bearing on any issue in this case;

2. Any statements, written or recorded, and the substance of any oral statement, made by the defendant or by a codefendant;

3. Any reports or statements, oral or written, by any witness, including expert witnesses, regarding the results of any scientific, chemical, physical, or mental examination, comparison, or tests performed in connection with this case;

4. Any books, papers, documents, photographs, or tangible objects which the prosecutor intends to use in the hearing or trial or which were obtained from or belonged to the defendant, together with a synopsis of its alleged connection to the charges herein;

5. Any record of prior criminal convictions known to the prosecuting authority of the defendant or of any persons whom the prosecutor intends to call as witnesses at the hearing or trial; and

6. Any evidence of an exculpatory nature pursuant to *Brady v. Maryland*, 373 U.S. 93 (1963), or impeachment evidence pursuant to *United States v. Bagley*, 473 U.S. 667 (1985).

7. Copies of or access to any "911" or other recordings of police communications relative to the arrest of the defendant herein.

8. Any expert witnesses whom the prosecutor will call at the hearing or trial, the subject of their testimony, and any reports relating to the subject of their testimony that they have submitted to the prosecuting authority.

9. Any information indicating entrapment of the defendant.

10. Information pertaining to any searches of defendant and items or fruits seized as a result of the search.

11. The relationship, if any, of specified persons to the prosecuting authority.

12. Any electronic surveillance, including wiretapping, of the defendant's premises or conversations to which the defendant was a party and any record thereof.

YOU ARE HEREBY NOTIFIED that failure to comply with the demands contained herein will result in defendant moving for appropriate relief at time of hearing or trial.

Submitted by: _____ . Date: _____, 2006