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OCT 15 2018

Superior Court of WA
Sharon Fogo

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IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR MASON COUNTY

STATE OF WASHINGTON,

Plaintiff,

vs.

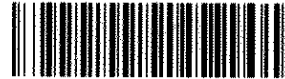
TAYLOR N BARRETT

Defendant.

NO. 18-1-00277-23

PLAINTIFF'S OMNIBUS
APPLICATION

18-1-00277-23
OMAPA 10
Omnibus Application of Prosecuting Attorney
4042576



I. The State of Washington makes the applications or motions checked:

1. Defendant to state the general nature of defendant's defense.
2. Defendant to state whether or not defendant will rely on an alibi and, if so, to furnish a list of defendant's alibi witnesses and their addresses.
3. Defendant to state whether or not the defendant will rely on a defense of insanity or diminished capacity at the time of the offense.
 - (a). If so, defendant to supply the name(s) of the defendant's witness(es) on the issue, both lay and professional.
 - (b). If so, defendant to permit the prosecution to inspect and copy all medical reports under the control of the defendant or defendant's lawyer.

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(c). Defendant will also state whether or not defendant will submit to a psychiatric examination by a doctor selected by the prosecutor.

(d). Defendant to provide the state with a list of the qualifications of the witness.

4. Defendant to furnish results of scientific tests, experiments or comparisons and the names of persons who conducted the tests and their qualifications.
5. Defendant to appear in a line-up.
6. Defendant to speak for voice identification by witnesses.
7. Defendant to be fingerprinted.
8. Defendant to pose for photographs (not involving reenactment of the crime).
9. Defendant to try on articles of clothing.
10. Defendant to permit taking of specimens of material under fingernails.
11. Defendant to permit taking samples of blood, hair, and other materials of the body which involve no unreasonable intrusion.
12. Defendant to provide samples of defendant's handwriting.
13. Defendant to submit to a physical external inspection of defendant's body.
14. Defendant to state whether there is any claim of incompetency to stand trial.
15. For discovery of the names and addresses of defendant's witnesses and their statements.
16. To inspect physical or documentary evidence in possession of the defendant or defendant's lawyer.
17. To take deposition(s) of the following witnesses:

18. To secure the appearance of a witness at trial or hearing:
19. Defendant to state whether defendant's prior convictions will be stipulated or need to be proved.
20. Defendant to state whether defendant will stipulate to the continuous chain of custody of evidence from acquisition to trial.
21. The defendant is put on notice that the following additional charges will be filed prior to trial if this matter is not resolved by plea on or before the pre-trial date:
Reckless Burning
Assault
Accomp to both
22. For a child hearsay hearing pursuant to RCW 9A.44.120.

II. The State makes the following representations:

(a). The State may call as witnesses:

NAME	AGENCY/ ADDRESS	PHONE
Lori L Bruce	301 E Lakeshore Dr. W Shelton WA 98584	
Aviana Castorena	60 E Cedargrove Ln Shelton WA 98584	
Richard Holloway	1280 E Timberlake Dr. Shelton WA 98584	
Albert Kassell	815 88th Ave SE Tumwater Olympia WA 98501	(360) 902-1603
Matt Ledford	P.O. Box 1037 322 N. 3Rd Street Shelton WA 98584	(360) 427-9670 Ext 313
Chris Liles	P.O. Box 1037 322 N. 3Rd Street Shelton WA 98584	(360) 427-9670 Ext 313
TAZJIA J. MORGAN	130 E. OLDE LYME RD Shelton WA 98584	(360) 490-5513
Detective Jeff Rhoades, #1344	Mason County Sheriff's Office P.O. Box 1037 322 N. 3rd Street Shelton, WA 98584	(360) 427-9670 Ext 627
Brandon Rincon	1721 W Hurley Waldrip Rd. Shelton WA 98584	
Douglas Waggoner	4100 E Agate Rd. Shelton WA 98584	
Melissa Wood	P.O. Box 1037 322 N. 3Rd Street Shelton WA 98584	(360) 426-0567

Any person listed in the police reports may be called as a witness.

(b). The State is aware of the following convictions of persons it intends to call as witnesses:

Lori Bruce
05/11/01 DWLS 3RD DEGREE
04/17/99 DWLS 3RD DEGREE
09/01/97 DUI
09/01/97 DWLS 3RD DEGREE

(c). The following exhibits obtained, seized or prepared as indicated may be offered in the State's case-in-chief:

EXHIBIT

SOURCE

See Discovery

(d). The results of the following scientific tests, experiments or comparisons may be offered in the State's case-in-chief through the witnesses indicated:

TEST

WITNESS

(e). If the defendant testifies at trial, the State may offer evidence of the following prior convictions:

OFFENSE

CONVICTION DATE

SENTENCE

(f). The State is in possession of or is aware of, the following evidence favorable to the defendant on the issue of guilt:

None

(g) The State is aware of:

- written statements by the defendant
- oral statements by the defendant
- these statements may be offered into evidence.

**The State may move the court to Join this case with Co-Defendant Benjamin Solano's case if both cases go to trial.

The estimated length of trial is 2 days.

Date: October 17 2018

MICHAEL K DORCY
Prosecuting Attorney

By:

RP
Karin E Phomma, WSBA #47960
Deputy Prosecuting Attorney