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MASON CO. WA

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18-1-00277-23
OMAD 12
Omnibus Application by Defendant
4048245



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF MASON

STATE OF WASHINGTON, Plaintiff, v. TAYLOR N. BARRETT, Defendant.	NO. 18-1-00277-23 DEFENDANT'S OMNIBUS APPLICATION
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COMES NOW the defendant above-named and makes application of motions stated below.

<input checked="" type="checkbox"/>	1.	To dismiss for failure of the information (or indictment) to state an offense.
<input checked="" type="checkbox"/>	2.	To make more definite and certain by providing a Bill of Particulars.
<input type="checkbox"/>	3.	To sever defendant's case and for separate trial.
<input type="checkbox"/>	4.	To sever counts and for a separate trial.
<input type="checkbox"/>	5.	To join offenses.
<input type="checkbox"/>	6.	To change venue.
<input type="checkbox"/>	7.	For a continuance.
<input checked="" type="checkbox"/>	8.	For discovery of all oral, written or recorded statements made by defendant and all witnesses to investigating officers or to third parties and in the possession or control of the plaintiff.

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1	<input checked="" type="checkbox"/>	9.	For the discovery of the names and addresses of all plaintiff's witnesses.
2	<input checked="" type="checkbox"/>	10.	To inspect all physical or documentary evidence in plaintiff's possession relating to this case.
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4	<input type="checkbox"/>	11.	To suppress physical evidence in plaintiff's possession because of (a) illegal search, (b) illegal arrest, and for the return of the same.
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6	<input type="checkbox"/>	12.	For a confession hearing under Rule 3.5.
7	<input type="checkbox"/>	13.	To suppress evidence of the identification of the defendant.
8	<input type="checkbox"/>	14.	To take the deposition of witnesses.
9	<input type="checkbox"/>	15.	To secure the appearance of witnesses at trial or hearing.
10	<input type="checkbox"/>	16.	To inquire into the conditions of pre-trial release.
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12	<input type="checkbox"/>	17.	For appointment of expert or for services other than counsel.

TO REQUIRE THE PROSECUTION TO:

14	<input type="checkbox"/>	18.	State (a) if there was an informant involved, (b) whether he will be called as a witness at the trial, and (c) to state the name and address of the informer of claim the privilege.
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17	<input checked="" type="checkbox"/>	19.	Disclose all evidence within plaintiff's knowledge or in plaintiff's possession favorable to the defendant or which tends to negate defendant's guilt.
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19	<input checked="" type="checkbox"/>	20.	Provide any record of prior arrest or convictions of the defendant known to or control of the prosecuting attorney or law enforcement.
20			
21	<input checked="" type="checkbox"/>	21.	Disclose whether it will rely on prior acts or convictions of a similar nature for proof of knowledge or intent.
22	<input checked="" type="checkbox"/>	22.	Advise whether any expert witness will be called, and if so, supply... (a) the name of the witness, qualifications and subject matter of testimony, and (b) report.
23	<input checked="" type="checkbox"/>	23.	Produce and have in attendance at trial all expert witnesses.
24	<input checked="" type="checkbox"/>	24.	Supply any reports or tests of physical or mental examinations in the control of the prosecution.
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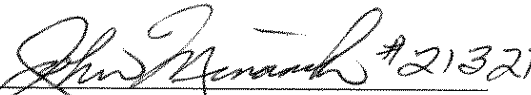
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<input checked="" type="checkbox"/>	25.	Supply any report of scientific test, experiments or comparisons or other reports to experts in the control of the prosecution, pertaining to this.
<input checked="" type="checkbox"/>	26.	Permit inspection and copying of any books, papers, documents, photographs or tangible objects which the prosecution (a) obtained from or belonging to the defendant, or (b) which will be used at the hearing or trial.
<input checked="" type="checkbox"/>	27.	Supply any information known concerning a prior conviction of persons, whom the prosecution intends to call as witnesses at the hearing or trial.
<input checked="" type="checkbox"/>	28.	Inform the defendant of any information the prosecution has indicating entrapment of the defendant.
<input type="checkbox"/>	29.	Hold a line-up. ANSWER:
<input type="checkbox"/>	30.	Allow the defendant to pose for a photograph in the jail.
<input type="checkbox"/>	31.	Permit the defendant to compel examination, tests or comparisons of evidence in the prosecutor's control by experts of the defendant's selection.
<input checked="" type="checkbox"/>	32.	Indicate any electronic surveillance including, but not limited to wiretapping of the defendant's premises or conversations to which the defendant was a party and any record thereof.
<input checked="" type="checkbox"/>	33.	Disclose all statements of co-defendants and to indicate whether or not all or portions thereof are intended to be offered for any purpose.
<input checked="" type="checkbox"/>	34.	Disclose all searches and seizures.
<input checked="" type="checkbox"/>	35.	Disclose the relationship, if any, of State's witnesses to the prosecuting authority.
<input checked="" type="checkbox"/>	36.	Supply within 48 hours of receipt of all discoverable information within the knowledge, possession, or control of others to be made available to the defendant.
<input checked="" type="checkbox"/>	37.	Attempt to cause such discoverable material or information which subsequently comes into the hands or control of others to be made available to the defendant.
COMES NOW the defendant and further makes the following applications, motions and presentations:		
<input checked="" type="checkbox"/>	38.	The defendant may call as witnesses: Self. Others to be provided by Pre-Trial

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2	<input type="checkbox"/> 39.	The following exhibits may be offered at trial by the defendant:
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5	<input type="checkbox"/> 40.	The results of the following scientific test, experiments or comparisons may be offered by the defendant:
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8	<input checked="" type="checkbox"/> 41.	The following defenses may be raised: <input checked="" type="checkbox"/> General denial Incompetency to stand trial Mental responsibility is an issue because:
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11	<input type="checkbox"/> 42.	Other:
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13	<input checked="" type="checkbox"/> 43.	A jury <u> X </u> will not be waived _____ will be waived.
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16	<input type="checkbox"/> 44.	Defendant's moves for the following discovery:
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18	<input checked="" type="checkbox"/> 45.	Defendant requests disclosure of the following impeachment material: (a) All prior convictions of any witness called by the State, including juvenile adjudications; (b)
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It is estimated that this trial will last 2+ days.

DATED THIS 15th day of October, 2018.

 #21321
John McNamara, WSBA # 21677
Attorney for Defendant

**THIS OFFICE DOES NOT
ACCEPT ELECTRONIC OR FAX SERVICE**

DEFENDANT'S OMNIBUS APPLICATION