

**ORIGINAL**  
**IN THE DISTRICT COURT OF PITTSBURG COUNTY**  
**STATE OF OKLAHOMA**

STATE OF OKLAHOMA,

PLAINTIFF,

vs

Case No. CF-2024-156

CHRIS MORRIS

DEFENDANT.

BY                       
DEPUTY  
PAM SMITH

2024 MAY 23 PM 1:19

RECEIVED AND FILED  
IN DISTRICT COURT  
PITTSBURG COUNTY, OKLA

**DEFENDANT'S MOTION FOR DISCOVERY**

COMES NOW, the Defendant by and through counsel and moves this Court to order the Plaintiff to produce certain discovery in compliance with the Oklahoma Discovery Code, 22 O.S. § 2001 et seq., and applicable case law. The Defendant submits the following:

**DISCOVERY REQUESTS**

The Defendant moves this Court for an Order requiring the State of Oklahoma, by and through the Office of the District Attorney, to produce and permit the Defendant to inspect and/or copy or photograph each of the following:

1. The names and addresses of all State witnesses, together with their relevant oral, written or recorded statement or summaries of the same. This request includes any rebuttal witnesses that the State has knowledge of.
2. Any written or recorded statements and the substance of any oral statement made by the accused or made by any Co-Defendant or an uncharged co-conspirator, or witness.
3. Any reports or statements made by experts in connection with the particular case, including the results of physical or mental examinations and of scientific tests, experiments or comparisons.

4. Any books, papers, documents, photographs, tangible objects, buildings or places which the prosecuting attorney intends to use in the hearing or trial or which were obtained from or belonged to the accused or any other person or entity.
5. Any record of prior criminal convictions of the Defendant or of any Co-Defendant, charged or uncharged co-conspirator.
6. OSBI or FBI rap sheets/records check on any witness listed by the State or the defense as a possible witness who will testify at trial.
7. Any material or information within the prosecutor's possession or control which tends to negate the guilt of the accused as to the offense charged or which would tend to reduce the punishment of the accused.
8. A list of all evidence and the names of the persons who have control of the same, that the State of Oklahoma intends to offer into evidence at trial in their case in chief, or by way of cross-examination of any defense witness, which is known to the State at the time of this Motion.
9. Any and all agreements made with any potential Co-Defendant or any witness that was made for the purpose of inducing an individual to testify, whether any such agreement is in writing or oral, and whether any such agreement, promises or immunity has been offered to such person for the purpose of a lesser sentence or any such other form of leniency. Additionally, disclose any efforts or communication made by law enforcement officers on behalf of any of the State's witnesses to obtain their release from incarceration or leniency in any prosecution.
10. All raw data generated by an investigative officer, authority or agency in this matter including the Oklahoma State Bureau of Investigation, District Attorney investigator or other person.

11. To the extent that such information is not included in the above requests, the entire investigative file including all statements, reports, photographs, documents, recordings, records, or any other tangible item and/or thing concerning in any way the allegations charged or uncharged against the Defendant.

### AUTHORITY

These requests are made pursuant to *Allen v. District Court of Washington County*, 803 P2d 1164 (Okl. Crm. 1991) and *Brady v. Maryland*, 373 US 83; 22 O.S. § 2001, et. seq.

WHEREFORE, premises considered the Defendant prays that this Court grant his Motion to for Discovery and to Set a Specific Discovery Schedule and any other relief deemed just by this Court.

GOTCHER & BEAVER LAW FIRM

By:

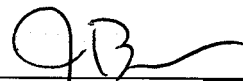


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ATTORNEYS FOR DEFENDANT

### CERTIFICATE OF MAILING

I hereby certify that on this 23 day of May, 2024, I delivered, mailed, emailed, or faxed a true and correct copy of the above and foregoing to:

Jack Thorp,  
District Attorney, District 27  
307 E Cherokee  
Wagoner, Oklahoma 74467  
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Jeremy Beaver