# STATE’S MOTION TO PRODUCE NOTICE OF INSANITY DEFENSE, ALIBI, WITNESSES AND PRODUCTION OF REPORTS

# State of Oklahoma

 COMES NOW the State of Oklahoma and moves that the District Court order the Defendant to provide the State with notice of insanity defense, notice of alibi defense, the names and addresses of all defense witnesses to be called at trial and the production of all reports and exhibits to be offered into evidence.

 The State requests that the Defendant produce and disclose the following material:

1. Notice of the use of insanity Defense to include the names and addresses of any experts and copies of all reports made or used in the examination of the defendant. The names, addresses and witness statements relating to any mental defects or conditions of the defendant that the defense plans on introducing into evidence. Further, that said notice is provided at least twenty days prior to trial. 22 O.S.A. § 1176.
2. Written notice of the full names, current addresses, telephone numbers, social security numbers, and birth dates of all alibi witnesses to include the date, time and place of the alleged alibi together with the witness statement or summaries to those facts. Further that said notice is given at least ten days prior to trial. See 22 O.S.A. §585.
3. The full names, current addresses, telephone numbers, social security numbers, and birth dates of all witnesses the defense will call at trial together with their written or recorded statements or summaries of the same at least ten days prior to trial.
4. The production of all written exhibits, physical evidence, photographs, mental or physical examination reports and any other scientific report or statement that the defense intends to offer into evidence at least ten days prior to trial.

In support of the State’s motion, the State would cite *Allen v. District Court of Washington County, State of Oklahoma*, 803 P.2d 1164 (Okl. Cr. 1991).

Dated:

Respectfully submitted,

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District Attorney

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Assistant District Attorney