

IN THE SUPERIOR COURT OF FORSYTH COUNTY

DEC 29 2006

STATE OF GEORGIA

Douglas Savella
CLERK SUPERIOR COURT

THE STATE OF GEORGIA

VS.

Indictment #06CR-0126

JULIA LYNN WOMACK TURNER

STATE'S DEMAND FOR RECIPROCAL DISCOVERY

COMES NOW THE STATE OF GEORGIA, by the District Attorney of Forsyth County and again makes demand upon defendant for any and all reciprocal discovery for which the State is entitled, showing the following:

1.

On March 30, 2006, the State acknowledged receipt of notice of defendant's election to come within the reciprocal discovery provisions of OCGA 17-16-1, et seq. and the state's demand for discovery by letter and motion was filed in the court and served upon defendant. On April 26, 2006, the State provided defendant with a list of witnesses, along with additional witnesses, as well as defendant's GCIC record and statements by defendant, all complying with the provisions of the law requiring delivery of such material to defendant. Thereafter on June 5, 2006, additional discovery was disclosed to defendant as required. Witness information updates were disclosed on several occasions. Counsel was notified that the State's entire file was available for review and copying. The State has complied with the provisions of the Discovery statute.

2.

On June 9, 2006, after hearing, the Court entered an order on June 9th, 2006, granting the State's Supplemental Demand for Discovery to be provided to the state within ten (10) days of timely compliance by the State as to the case-in-chief.

3.

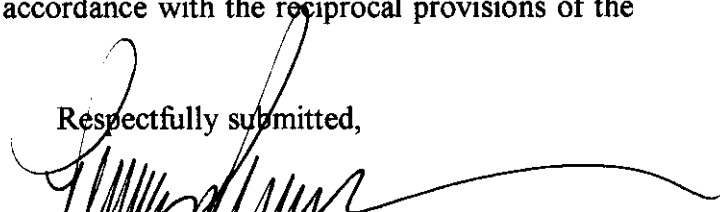
The State received nothing from the Defendant until on December 19, 2006, a witness list was received by fax transmittal. The list is incomplete, even to the point of listing defendant's parents at a former address. Witnesses Dr. Rob Palmer and Dr. Heath Joliff fail to list their full addresses. None of the witnesses contain their dates of birth.

No reports by independent experts have been served upon the State. If oral or partially oral, the defendant "shall reduce all relevant and material oral portions of such report to writing and shall serve opposing counsel with such portions no later than five days prior to trial". OCGA 17-16-4(b)(2).


4.

The State is again seeking to have the information and reports of any witnesses to be called by the defendant at trial. The State is not asking for a pretrial hearing, but this motion is being filed and served upon counsel for defendant to ensure that the State of Georgia is properly furnished any witnesses, witness information, and reports of witnesses to be called by defendant in accordance with the reciprocal provisions of the statute and with the court's order.

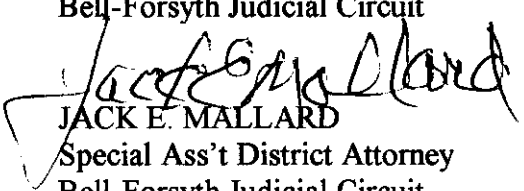
Respectfully submitted,



DENNY A. PEIKIN, District Attorney
Bell-Forsyth Judicial Circuit



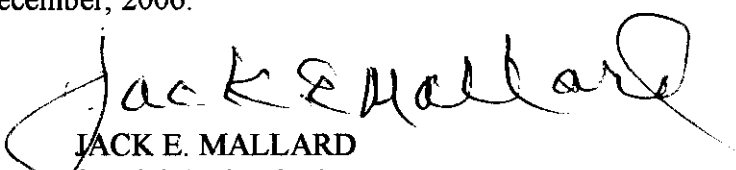
SANDRA PARTRIDGE
Chief Ass't District Attorney
Bell-Forsyth Judicial Circuit



JACK E. MALLARD
Special Ass't District Attorney
Bell-Forsyth Judicial Circuit

CERTIFICATE OF SERVICE

I have served Counsel for defendant, Mr. Jimmy Berry, Attorney at Law, 236 Washington Avenue, Marietta, GA 30060, by first-class U.S. mail delivery at the foregoing address, this 29 day of December, 2006.



JACK E. MALLARD
Special Ass't District Attorney
Bell-Forsyth Judicial Circuit

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