

Belinda Blessingame

**CAUSE NO. 8269
CAUSE NO. 8270**

THE STATE OF TEXAS	§	IN THE 32ND DISTRICT COURT
VS.	§	OF
SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

**PRE-TRIAL MOTION NO. 5
FOR DISCOVERY - PHOTOGRAPHS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, SHAWN ADKINS, Accused in the above-styled and numbered cause, by and through his attorney of record, Matt Powell, and makes this Motion for Discovery; and in support thereof would show this Honorable Court that the Accused requests discovery as follows:

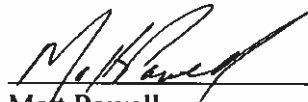
1. All photographs, drawings and charts made by the agent of the District Attorney's Office or any law enforcement agency, which were made with reference to this case, including but not limited to all photographs, drawings and charts of the scene of the crime and the scene of the Accused's arrest.
2. All photographs of the decedent, whether taken at the scene of the alleged offense, at the scene where the decedent was discovered or at the time the autopsy was performed, whether by law enforcement, medical examiner or other person.
3. All photographic negative prints whether or not heretofore developed by the agent of the District Attorney or any law enforcement agency which were made in the investigation of this case.
4. All photographs of suspects that were shown to all witnesses to the alleged offense concerning the identity of the perpetrator of the offense for which the Accused has been indicted.

5. All photographs of the Accused which were used in conjunction with the investigation of this case, including any photograph that may have been shown by any law enforcement officer to any potential witness in this case.

WHEREFORE, PREMISES CONSIDERED, the Accused respectfully prays that this Honorable Court will grant the Accused's Motion for Discovery in all things.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell

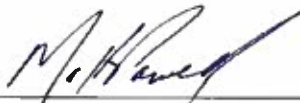
State Bar No: 00784782

Email: matt@pptlawgroup.com

Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 8th day of November, 2022.



Matt Powell

Automated Certificate of eService

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Erika Zamora on behalf of Matthew Dane Powell
Bar No. 784782
ezamora@pptlawgroup.com
Envelope ID: 69973737
Status as of 11/8/2022 11:52 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Joshua Somers		joshua.somers@oag.texas.gov	11/8/2022 11:35:42 AM	SENT
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THE STATE OF TEXAS	§	IN THE 32ND DISTRICT COURT
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SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

PRE-TRIAL MOTION NO. 7
MOTION FOR DISCOVERY – LAW ENFORCEMENT NOTES

TO THE HONORABLE JUDGE OF SAID COURT:

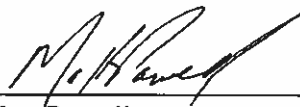
COMES NOW, SHAWN ADKINS, Accused in the above-styled and numbered caused, by and through his attorney of record, and makes this Motion for Discovery; and in support thereof would show this Honorable Court that the Accused requests discovery as follows:

1. All handwritten and typed notes made by all law enforcement officers prior to, during and after the Accused was interrogated; or in the alternative, that all said handwritten and typed notes be accurately preserved and maintained by said law enforcement officers until the trial of this cause, in order that same may be available to the court and the jury on the issue of the voluntariness of the Accused's statements.
2. All handwritten and typed notes of the police officers who investigated OR participated in any manner in this case.

WHEREFORE, PREMISES CONSIDERED, the Accused respectfully prays that this
Honorable Court will grant the Accused's Motion for Discovery in all things.

Respectfully submitted,

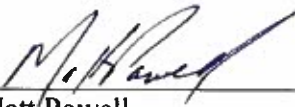
Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

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THE STATE OF TEXAS	§	IN THE 32ND DISTRICT COURT
VS.	§	OF
SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

**PRE-TRIAL MOTION NO. 8
REQUEST FOR DISCOVERY OF PROSECUTION EXPERTS**

TO THE DISTRICT ATTORNEY OF MITCHELL COUNTY, TEXAS:

COMES NOW SHAWN ADKINS, by and through undersigned counsel, pursuant to the Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution and Article I, Sections 3, 10, 13 and 19 of the Texas Constitution and TEX. CODE CRIM. PROC. ANN. Article 39.14(b) for Discovery of Prosecution Experts.

1. TEX. CODE CRIM. PROC. ANN. article 39.14 (b) was amended, effective September 1, 1999, and now provides:

On motion of a party and on notice to the other parties, the court in which an action is pending may order one or more of the other parties to disclose to the party making the motion the name and address of each person the other party may use at trial to present evidence under rules 702, 703, and 705, Texas Rules of Evidence. The court shall specify in the order the time and manner in which the other party must make the disclosure to the moving party, but in specifying the time in which the other party shall make disclosure the court shall require the other party to make the disclosure not later than the 20th day before the trial begins.

2. Mr. Adkins hereby requests the State to disclose to Mr. Adkins's counsel, the name and address of each person the State may use at trial to present expert opinion evidence under 702, 703 and 705 of the Texas Rules of Evidence.

WHEREFORE, PREMISES CONSIDERED, Mr. Adkins respectfully requests that the state comply with the defendant's Request for Discovery of Prosecution Experts no later than the 180th day before the trial begins with the commencement of jury voir dire.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell

State Bar No: 00784782

Email: matt@pptlawgroup.com

Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

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Matt Powell

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ezamora@pptlawgroup.com
Envelope ID: 69973737
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CAUSE NO. 8269
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THE STATE OF TEXAS	§	IN THE 32 ND DISTRICT COURT
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SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

**PRE-TRIAL MOTION NO. 9
MOTION FOR DISCOVERY – TANGIBLE THINGS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, SHAWN ADKINS, Accused in the above-styled and numbered cause, by and through his attorney of record, Matt Powell, and makes this Motion for Discovery; and in support thereof would show this Honorable Court that the Accused requests discovery as follows:

1. All objects tangible property alleged by the State to have been taken or used by the Accused or any co-conspirator during the course of the commission of the offense with which the Accused is herein indicted.
2. All weapons alleged by the State to have been used by the Accused, each co-defendant and each co-conspirator in the commission of the offense with which Accused is herein indicted.
3. All articles of clothing, including shirts, pants, undergarments and shoes allegedly belonging to the Accused and to the decedent.
4. All contraband drugs, controlled substances and paraphernalia which was seized as a result of the investigation of this case.
5. All documents, papers, books, accounts, letters, objects and tangible things which are the property of the Accused and which are in the possession, custody and control of the prosecutor or law enforcement or their agents.

6. All documents, paper, books, accounts, letters, objects and tangible things which are in the possession, custody and control of the prosecutor or law enforcement as a result of the investigation in this case and which are material evidence in this case as to the Accused's innocence, or as the punishment, if any.

WHEREFORE, PREMISES CONSIDERED, the Accused respectfully prays that this Honorable Court will grant the Accused's Motion for Discovery in all things; or in the alternative, that this Court schedule this matter for a hearing prior to trial on the merits and that at such hearing this motion will be in all things granted.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

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CAUSE NO. 8269
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THE STATE OF TEXAS	§	IN THE 32 ND DISTRICT COURT
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DEFENDANT'S ELECTION FOR THE JURY TO ASSESS PUNISHMENT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the Defendant, SHAWN ADKINS, in the above-styled and numbered cause, in open Court at the time of entering his plea and, in accordance with Tex. Code Crim. Proc. Ann., Art. 37.07, elects that the punishment upon any conviction for a lesser included offense in this case be assessed by the jury.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully prays that the Court submit all matters regarding punishment to the jury.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

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III.

Mr. Adkins further moves that this Court order the District Attorney to forthwith deliver the transcript of the Grand Jury testimony of said witness or witnesses to defense counsel pursuant to TEX. CODE CRIM. PRO. ANN. art. 20.02(d), and as grounds therefore, Mr. Adkins would show the following further particularized needs:

1. To cross-examine and impeach said witness or witnesses.
2. To discover prior inconsistent statements.
3. To test the credibility of said witness or witnesses.
4. To test recollection of said witness or witnesses.
5. To develop mitigating circumstances arising from the circumstances of the offense, in the event of a conviction.

IV.

Mr. Adkins submits that if he is deprived of the use of said Grand Jury transcripts in this and the related cases, such action will deny Mr. Adkins the constitutional rights under the right to counsel and the Confrontation Clause of the Sixth and Eighth Amendments of the *United States Constitution* and the Due Process Clause and Equal Protection Clause of the Fourteenth Amendment of the *United State Constitution*, as said transcript and related exhibits are available to the District Attorney but not available to the Defendant. See *Dennis v. United States*, 384 U.S. 855, 86 S.Ct. 1840, 16 L.Ed.2d 973 (1966); *Cargill v. Untied States*, 381 F.2nd 849 (10th Cir. 1967); and *Pointer v. Texas*, 380 U.S. 400, 85 S.Ct. 1065, 13 L.Ed.2d 923 (1965).

V.

Mr. Adkins requests that this Court order the District Attorney to deliver forthwith the Grand Jury transcripts and exhibits produced in his case and any other companion cases that may be asserted by the state on the same nucleus of operative facts.

WHEREFORE, PREMISES CONSIDERED, Mr. Adkins prays that this Court order the District Attorney to obtain a written transcription of all the witnesses who testified before the Grand Jury regarding the facts of this cause and that this Court order the District Attorney to deliver forthwith the Grand Jury transcript of said witnesses to defense counsel.

Respectfully submitted,

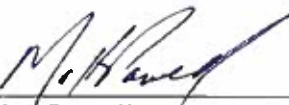
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THE STATE OF TEXAS	§	IN THE 32 ND DISTRICT COURT
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PRETRIAL MATTER
DEFENDANT'S REQUEST FOR DISCOVERY AS AUTHORIZED BY
ARTICLE 39.14 OF THE TEXAS CODE OF CRIMINAL PROCEDURE

TO THE DISTRICT ATTORNEY OF LUBBOCK COUNTY, TEXAS:

COMES NOW, SHAWN ADKINS, the Accused by and through counsel, and files this request for discovery of legally discoverable, but previously undisclosed materials:

I.

The Michael Morton Act directs defense counsel to make requests for discovery to the prosecutor, rather than motions to the court. This request is intended to better comply with the Michael Morton Act.

The state has previously provided discovery to the Defense. The Accused here and now requests only such materials that are legally discoverable, but not yet disclosed. The Accused does not seek to obtain duplicate materials that do not contain any new information.

II.

The Accused requests discovery required to be produced by the State under Article 39.14 of the Texas Code of Criminal Procedure and the principles of due process that underlay *Brady v. Maryland*, 373 U.S. 83 (1963) and *Kyles v. Whitley*, 514 U.S. 419

(1995) and as expanded in *Watkins v. State*, 619 S.W.3d 265. The *Watkins* Court noted that “the Michael Morton Act did not merely amend a portion of Article 39.14(a); it revamped Article 39.14 completely.” This revamp resulted in “an overhaul of discovery in Texas.” In doing so, the *Watkins* Court explained:

On the whole, the statutory changes broaden[s] criminal discovery for defendants, making disclosure the rule and non-disclosure the exception. Significantly, Article 39.14(h) places upon the State a free-standing duty to disclose all “exculpatory, impeaching, and mitigating” evidence to the defense that tends to negate guilt or reduce punishment. Our Legislature did not limit the applicability of Article 39.14(h) to “material” evidence, so this duty to disclose is much broader than the prosecutor’s duty to disclose as a matter of due process under *Brady vs. Maryland*. This subsection blankets the exact type of exculpatory evidence at issue in the Michael Morton case while creating an independent and continuing duty for prosecutors to disclose evidence that may be favorable to the defense even if that evidence is not “material.” (Internal citations omitted)

The State has an affirmative duty to disclose this evidence that would negate guilt and mitigate punishment. As the *Watkins* Court stated:

Evidence need not by itself prove or disprove a particular fact to be relevant; it is sufficient if the evidence provides a small nudge toward proving or disproving some fact of consequence. Under Article 39.14(h), the State has an affirmative duty to disclose any relevant evidence that tends to negate guilt or mitigate punishment regardless of whether the evidence is “material” under *Brady v. Maryland*.

This request applies to all material in possession, custody, or control of the State or any person under contract with the State, including but not limited to:

1. All reports and applications for arrest and search warrants generated by any law enforcement agency involved in the investigation of this case, as well as the search or arrest warrants themselves.
2. All written or electronically recorded consents to search anything or place given in connection with this case.

3. All statements (whether oral or written) alleged to have been made by the Accused, any codefendants, and all witnesses (including law enforcement officers, unindicted co-conspirators, jailhouse snitches and cooperating witnesses);
4. All video and audio recordings made during the investigation of this case or considered as evidence in this case (such as in-car videos, jail videos, dispatch traffic, 911 calls, etc.), cell phone data, internet search data, Facebook and other social media input and responses, digital data taken from any computer or other electronic device of the Accused or the codefendants or any co-conspirators;
5. Books, accounts, letters to or from the defendant or any codefendants;
6. All photographs and drawings created by the State during its investigation of this case or considered as evidence in this case;
7. All biological material collected as potential evidence in this case;
8. The autopsy report on the deceased, any toxicology report, and related documents and materials;
9. A list of all witnesses the state expects to call at any phase of the trial with their contact data sufficient to permit the defense to locate and interview them;
10. All records of judgments of criminal conviction of the Accused, any codefendants, accomplices, cooperating witnesses, jailhouse snitches, and other witnesses.
11. All records of delinquent conduct by the Accused, including any legal proceedings against or adjudications of the Accused as a juvenile.

12. All written and electronically recorded evidence of extraneous misconduct of the Accused.

13. All other tangible things that constitute or contain evidence material to any matter involved in this case.

The Accused further requests that the State promptly notify the Accused of any newly discovered material and provide copies of said material to the Accused as soon as practicable upon its discovery and that such supplemental discovery continue to be provided until this case is disposed of (except as provided for in paragraph V below).

III.

This request does not apply to the State's work-product or any other material otherwise privileged by law unless disclosure is required by *Brady/Kyles*, supra.

IV.

The Accused is hereby formally requesting the name and address of each person the State may use at trial to present evidence under Rules 702, 703, and 705 of the Texas Rules of Evidence. The Accused requests that such disclosure shall be made no later than the 30th day before the date the voir dire of the prospective jurors begins as provided for by Article 39.14.

V.

If any portion of a document or item subject to this discovery request will be redacted or withheld by the State under paragraph II above, the Accused requests that the State inform him of such redaction or withholding as required by Article 39.14. If any such redaction or withholding occurs, The Accused hereby formally requests that the Court conduct a hearing and an *in camera* inspection of the redacted or withheld material to

determine whether the withholding or redaction is justified under Article 39.14 or any other law.

VI.

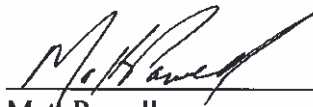
The Accused hereby formally requests that the State disclose any exculpatory, impeachment, or mitigating document, item, or information, in the possession, custody, or control of the State prosecution team that tends to negate the guilt of the Accused or would tend to reduce the punishment for the offense charged.

The Accused further requests that the State promptly supplement any exculpatory, impeachment, or mitigating document, item, or information by disclosing its existence promptly upon its discovery, whether that discovery is made before, during, or after the trial in this matter. See *Ex parte Temple*, No. WR-78,545-02 (Tex. Crim. App. Nov. 23, 2016), *unpublished*.

WHEREFORE, PREMISES CONSIDERED, the Accused requests the District Attorney of Hockley County to acknowledge receipt of this request and to produce the above requested items of previously undisclosed discovery items as soon as practicable after they first come to hand, and well in advance of the commencement of jury voir dire as required by Article 39.14 of the Texas Code of Criminal Procedure and the authorities cited above.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell

State Bar No: 00784782

Email: matt@pptlawgroup.com

Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 8th day of November, 2022.



Matt Powell

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Erika Zamora on behalf of Matthew Dane Powell
Bar No. 784782
ezamora@pptlawgroup.com
Envelope ID: 69973737
Status as of 11/8/2022 11:52 AM CST

Case Contacts

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DISTRICT ATTORNEY		richard@32ndda-tx.us	11/8/2022 11:35:42 AM	SENT

Belinda Blessingame

CAUSE NO. 8269
CAUSE NO. 8270

THE STATE OF TEXAS	§	IN THE 32 ND DISTRICT COURT
VS.	§	OF
SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

**PRETRIAL MATTER
REQUEST FOR TIMELY NOTICE OF THE STATE'S INTENTION TO USE
EVIDENCE OF EXTRANEOUS MISCONDUCT AT TRIAL**

TO THE DISTRICT ATTORNEY OF LUBBOCK COUNTY:

COMES NOW, SHAWN ADKINS, the Accused, by and through Counsel and pursuant to the Texas Rules of Evidence and the Texas Code of Criminal Procedure requests the District Attorney to give, in proper form, to counsel for the Accused timely notice of the proposed use of evidence, specifically:

RULE 404(b)

Pursuant to Rule 404(b), notice, at least 180 days prior to the commencement of jury voir dire, by the District Attorney his intent to introduce evidence in his case in chief of any other crimes, wrongs, or acts allegedly committed by Accused, other than those alleged in the Indictment or Information in this cause. Such notice to include, for each incident, all discovery required to be produced by the District Attorney under the Michael Morton Act, Art. 39.14 under the facts and circumstances of this case.

RULE 609

Pursuant to Rule 609(f), written notice, at least 180 days prior to the commencement of jury voir dire, of intent to use evidence of any prior conviction for the purpose of attacking the credibility of any witnesses.

RULES 803, 804, AND 902

Prior written notice, with complete copies, at least 180 days prior to the commencement of jury voir dire in this cause, of any records, documents, reports or other evidence which the District Attorney intends to introduce into evidence pursuant to any provision of Rule 803, Rule 804, or Rule 902 so that he may have a reasonable opportunity to investigate whether the preparation or sources of the information, or any other circumstances concerning the proposed evidence indicate a lack of trustworthiness.

The requested notice and opportunity to investigate the state's proposed evidence is an essential part of Accused's right to a fair trial, effective representation by counsel, constitutional due process, and the right to make a fair rebuttal to the state's case for death, pursuant to provisions of Article I, Sections 10 and 19 of the Constitution of the State of Texas, the Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution and the principles that underlay the opinion in *Gardner v. Florida*, 430 U.S. 349, 362 (1977) (“[P]etitioner was denied due process of law when the death sentence was imposed, at least in part, on the basis of information which he had no opportunity to deny or explain.”).

WHEREFORE, PREMISES CONSIDERED, Accused requests that the District Attorney timely provide counsel for the Accused with notices of intent to introduce evidence as specified in this request.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 8th day of November, 2022.



Matt Powell

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DISTRICT ATTORNEY		richard@32ndda-tx.us	11/8/2022 11:35:42 AM	SENT

Ginny Rivera

CAUSE NO. 8269
CAUSE NO. 8270

THE STATE OF TEXAS	§	IN THE 32 ND DISTRICT COURT
	§	
VS.	§	OF
	§	
SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

PRETRIAL MATTER
DEFENDANT'S FIRST AMENDED REQUEST FOR DISCOVERY AS
AUTHORIZED BY ARTICLE 39.14 OF THE TEXAS CODE OF CRIMINAL
PROCEDURE

TO THE DISTRICT ATTORNEY OF LUBBOCK COUNTY, TEXAS:

COMES NOW, SHAWN ADKINS, the Accused by and through counsel, and files this request for discovery of legally discoverable, but previously undisclosed materials:

I.

The Michael Morton Act directs defense counsel to make requests for discovery to the prosecutor, rather than motions to the court. This request is intended to better comply with the Michael Morton Act.

The state has previously provided discovery to the Defense. The Accused here and now requests only such materials that are legally discoverable, but not yet disclosed. The Accused does not seek to obtain duplicate materials that do not contain any new information.

II.

The Accused requests discovery required to be produced by the State under Article 39.14 of the Texas Code of Criminal Procedure and the principles of due process that

underlay *Brady v. Maryland*, 373 U.S. 83 (1963) and *Kyles v. Whitley*, 514 U.S. 419 (1995) and as expanded in *Watkins v. State*, 619 S.W.3d 265. The *Watkins* Court noted that “the Michael Morton Act did not merely amend a portion of Article 39.14(a); it revamped Article 39.14 completely.” This revamp resulted in “an overhaul of discovery in Texas.” In doing so, the *Watkins* Court explained:

On the whole, the statutory changes broaden[s] criminal discovery for defendants, making disclosure the rule and non-disclosure the exception. Significantly, Article 39.14(h) places upon the State a free-standing duty to disclose all “exculpatory, impeaching, and mitigating” evidence to the defense that tends to negate guilt or reduce punishment. Our Legislature did not limit the applicability of Article 39.14(h) to “material” evidence, so this duty to disclose is much broader than the prosecutor’s duty to disclose as a matter of due process under *Brady vs. Maryland*. This subsection blankets the exact type of exculpatory evidence at issue in the Michael Morton case while creating an independent and continuing duty for prosecutors to disclose evidence that may be favorable to the defense even if that evidence is not “material.” (Internal citations omitted)

The State has an affirmative duty to disclose this evidence that would negate guilt and mitigate punishment. As the *Watkins* Court stated:

Evidence need not by itself prove or disprove a particular fact to be relevant; it is sufficient if the evidence provides a small nudge toward proving or disproving some fact of consequence. Under Article 39.14(h), the State has an affirmative duty to disclose any relevant evidence that tends to negate guilt or mitigate punishment regardless of whether the evidence is “material” under *Brady v. Maryland*.

This request applies to all material in possession, custody, or control of the State or any person under contract with the State, including but not limited to:

1. All reports and applications for arrest and search warrants generated by any law enforcement agency involved in the investigation of this case, as well as the search or arrest warrants themselves.

2. All written or electronically recorded consents to search anything or place given in connection with this case.
3. All statements (whether oral or written) alleged to have been made by the Accused, any codefendants, and all witnesses (including law enforcement officers, unindicted co-conspirators, jailhouse snitches and cooperating witnesses);
4. All video and audio recordings made during the investigation of this case or considered as evidence in this case (such as in-car videos, jail videos, dispatch traffic, 911 calls, etc.), cell phone data, internet search data, Facebook and other social media input and responses, digital data taken from any computer or other electronic device of the Accused or the codefendants or any co-conspirators;
5. Books, accounts, letters to or from the defendant or any codefendants;
6. All photographs and drawings created by the State during its investigation of this case or considered as evidence in this case;
7. All biological material collected as potential evidence in this case;
8. The autopsy report on the deceased, any toxicology report, and related documents and materials;
9. A list of all witnesses the state expects to call at any phase of the trial with their contact data sufficient to permit the defense to locate and interview them;
10. All records of judgments of criminal conviction of the Accused, any codefendants, accomplices, cooperating witnesses, jailhouse snitches, and other witnesses.

11. All records of delinquent conduct by the Accused, including any legal proceedings against or adjudications of the Accused as a juvenile.
12. All written and electronically recorded evidence of extraneous misconduct of the Accused.
13. All other tangible things that constitute or contain evidence material to any matter involved in this case.

The Accused further requests that the State promptly notify the Accused of any newly discovered material and provide copies of said material to the Accused as soon as practicable upon its discovery and that such supplemental discovery continue to be provided until this case is disposed of (except as provided for in paragraph V below).

III.

This request does not apply to the State's work-product or any other material otherwise privileged by law unless disclosure is required by *Brady/Kyles*, supra.

IV.

The Accused is hereby formally requesting the name and address of each person the State may use at trial to present evidence under Rules 702, 703, and 705 of the Texas Rules of Evidence. The Accused requests that such disclosure shall be made no later than the 30th day before the date the voir dire of the prospective jurors begins as provided for by Article 39.14.

V.

If any portion of a document or item subject to this discovery request will be redacted or withheld by the State under paragraph II above, the Accused requests that the State inform him of such redaction or withholding as required by Article 39.14. If any such redaction or withholding occurs, The Accused hereby formally requests that the Court

conduct a hearing and an *in camera* inspection of the redacted or withheld material to determine whether the withholding or redaction is justified under Article 39.14 or any other law.

VI.

The Accused hereby formally requests that the State disclose any exculpatory, impeachment, or mitigating document, item, or information, in the possession, custody, or control of the State prosecution team that tends to negate the guilt of the Accused or would tend to reduce the punishment for the offense charged.

The Accused further requests that the State promptly supplement any exculpatory, impeachment, or mitigating document, item, or information by disclosing its existence promptly upon its discovery, whether that discovery is made before, during, or after the trial in this matter. See *Ex parte Temple*, No. WR-78,545-02 (Tex. Crim. App. Nov. 23, 2016), *unpublished*.

WHEREFORE, PREMISES CONSIDERED, the Accused requests the District Attorney of Mitchell County to acknowledge receipt of this request and to produce the above requested items of previously undisclosed discovery items as soon as practicable after they first come to hand, and well in advance of the commencement of jury voir dire as required by Article 39.14 of the Texas Code of Criminal Procedure and the authorities cited above.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 8th day of November, 2022.



Matt Powell

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Erika Zamora on behalf of Matthew Dane Powell
Bar No. 784782
ezamora@pptlawgroup.com
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Case Contacts

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DISTRICT ATTORNEY		Jordan@32ndda-tx.us	11/8/2022 2:51:31 PM	SENT
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Andrew Rountree		Andrew.Rountree@oag.texas.gov	11/8/2022 2:51:31 PM	SENT

at the trial is engrained in our law.²

6. Defendant would further show the Court that the incident which resulted in Defendant being indicted for murder is well known and has been widely discussed in Nolan County, Texas. Therefore, the odds of selecting a jury that could be fair and impartial, who have not had some contact with the incident itself, contact with someone else who was involved in the incident, or being able to not put aside what they already know about the incident are exceedingly poor.

7. The minimal constitutional standard³ of fairness requires that a defendant have a panel of impartial, indifferent jurors,⁴ and that the entire atmosphere in which the trial is conducted be impartial.⁵ Depriving a defendant of this right to an impartial jury and trial would violate the defendant's right to due process guaranteed by the Fourteenth Amendment.⁶ Thus, a defendant's possible right to a change of venue is an issue of constitutional dimensions.⁷

8. An impartial jury is defined as one which does not favor a party or an individual because of the emotions of the human mind, heart, or affections. It means that the defendant, the cause, and the issues involved in the cause must not be prejudiced.⁸

2 *Reynolds v. United States*, 98 U.S. 145 (U.S. 1878) ("The theory of the law is that a juror who has formed an opinion cannot be impartial.").

3 The Sixth Amendment to the U.S. Constitution provides in part: "In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed." U.S. Const., Amend. VI.

4 *Murphy v. Florida*, 421 U.S. 794, 799 (1975); *Irvin v. Dowd*, 366 U.S. 717, 722 (1961); see also *Parker v. Gladden*, 385 U.S. 363, 366 (1966) (per curiam) (noting that a defendant is "entitled to be tried by 12, not 9 or even 10, impartial and unprejudiced jurors"). See also *Virgil v. Dretke*, 446 F.3d 598, 605 (5th Cir. Tex. 2006) ("Put simply, 'The right to jury trial guarantees to the criminally accused a fair trial by a panel of impartial, 'indifferent' jurors.'").

5 *Pamplin v. Mason*, 364 F.2d 1, 3 (5th Cir. [Tex.] 1966).

6 *Groppi v. Wisconsin*, 400 U.S. 505, 509 – 510 (1971).

7 *Bridges v. State*, 471 S.W.2d 827, 828 (Tex. Crim. App. 1971); *Enriquez v. State*, 429 S.W.2d 141, 142 (Tex. Crim. App. 1968).

8 *Durrough v. State*, 562 S.W.2d 488, 489 – 490 (Tex. Crim. App. 1978) (citing *Randle v. State*, 28 S.W. 953 (1894), "The accused in this state, under our constitution and laws, is entitled to a 'fair trial by an impartial jury'; and there is no other method provided by which an accused can be tried and punished.").

9. The Texas Code of Criminal procedure allows for a change of venue upon a motion by the defendant where the Court has determined “[t]hat there exists in the county where the prosecution is commenced so great a prejudice against him that he cannot obtain a fair and impartial trial.”⁹

10. When outside influences affecting the community's climate of opinion as to a defendant are inherently suspect, the resulting probability of unfairness requires suitable procedural safeguards, such as a change of venue, to assure a fair and impartial trial.¹⁰ And while a court may take the stance that attempting to seat a jury in the original venue is a relevant barometer of the prevailing community beliefs and attitudes:

Regardless of the successful qualification of a jury panel, the evidence adduced during the pretrial hearing on the motion to change venue may dictate that a change of venue be granted in order to assure the accused a fair and impartial trial.¹¹

11. Quite simply, “[t]he successful qualification of a jury panel is *not the sole criterion* in determining whether a defendant is entitled to a change of venue, since conscious or subconscious juror prejudice can affect answers obtained on voir dire.”¹² Moreover, “[t]he influence that lurks in an opinion once formed is so persistent that it unconsciously fights detachment from the mental processes of the average man.”¹³ The Court of Criminal Appeals echoed this long-standing principle in *Faulkner v. State*,¹⁴ wherein the Court noted in reference to a motion for change of venue rejected by the trial court: “Prejudice is a sinister quality. It may

9 Tex. Code Crim. Proc. Art. 31.03(a)(1).

10 *Henley v. State*, 576 S.W.2d 66, 71 (Tex. Crim. App. 1978).

11 *Russell v. State*, 146 S.W.3d 705, 711 (Tex. App. Texarkana 2004) (citing *Henley*, at 71).

12 *Id.* (emphasis added).

13 *Irvin v. Dowd*, 366 U.S. 717, 727 (U.S. 1961).

14 *Faulkner v. State*, 43 Tex. Crim. 311, 65 S.W. 1093 (Tex. Crim. App. 1901).

possess a man and he not be aware of it; or, being aware of it, he may purposely conceal it, in order that he may vent his revenge.”¹⁵ Clearly, the law envisions the empanelment of not one prejudiced or impartial juror.

12. In *Remmer v. United States*, 347 U.S. 227, 229 (1954), the Supreme Court held that “[i]n a criminal case, any private communication, contact, or tampering, directly or indirectly, with a juror during a trial about the matter pending before the jury is, for obvious reasons, deemed presumptively prejudicial, if not made in pursuance of known rules of the court and the instructions and direction of the court made during the trial, with full knowledge of the parties.” *Id.* Moreover, “[c]ommunity participation in the administration of the criminal law, ... is not only consistent with our democratic heritage but is also critical to public confidence in the fairness of the criminal justice system.” *Taylor v. Louisiana*, 419 U.S. 522, 530 (1975).

13. In *Rule v. State*, 890 S.W.2d 158, 168 (Tex. App.-Texarkana 1994, pet. ref’d) the court listed several factors relevant to determining whether an outside influence affecting the community climate of opinion as to the defendant is inherently suspect, they include:

1) the nature of the publicity; 2) the degree to which it has been circulated in the community; 3) the connection of governmental officials with the release of pre-trial publicity; 4) the length of time between the dissemination of the publicity and the trial; 5) the severity and notoriety of the offense; 6) other events occurring in the community which affect the attitude of the community or the individual jurors toward the defendant, and 7) any other factor likely to affect the candor or veracity of the prospective jurors on voir dire.

16. The right to a fair trial is a fundamental liberty secured by the Fourteenth Amendment. *Drope v. Missouri*, 420 U.S. 162, 172 (1975). The presumption of innocence, although not articulated in the Constitution, is a basic component of a fair trial under our system

¹⁵ *Id.* at 323 (noting in particular that Texas’ venue statutes “wisely provide against that prejudice which may creep into the jury box.”).

of criminal justice. Long ago the Court stated:

The principle that there is a presumption of innocence in favor of the accused is the undoubted law, axiomatic and elementary, and its enforcement lies at the foundation of the administration of our criminal law." *Coffin v. United States*, 156 U.S. 432, 453 (1895).

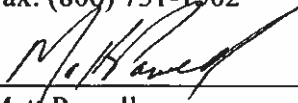
17. To implement the presumption, courts must be alert to factors that may undermine the fairness of the fact-finding process. In the administration of criminal justice, courts must carefully guard against dilution of the principle that guilt is to be established by probative evidence and beyond a reasonable doubt. *In re Winship*, 397 U.S. 358, 364 (1970).

18. This Motion is made pursuant to Tex. Code Crim. Proc. Ann. Art. 31.03; the Due Process requirements of 5th & 14th Amendments to the United States Constitution, Article 1 Secs. 13 & 19 of the Texas Constitution and Tex. Code Crim. Proc. Ann. Art. 1.04; the requirement of effective assistance of counsel under the 6th Amendment to the United States Constitution, Article 1 Sec. 10 of the Texas Constitution and Tex. Code Crim. Proc. Ann. Art. 1.051; the prohibition against cruel and unusual punishment of the 8th and 14th Amendments to the United States Constitution, Article 1 Secs. 10, 13, and 18 of the Texas Constitution and Tex. Code Crim. Proc. Ann. Art. 1.09; the right to an impartial jury under the 6th and 7th Amendments to the United States Constitution, Article 1 Secs. 10 & 15 of the Texas Constitution and Tex. Code Crim. Proc. Ann. Art. 1.05, 1.12, 35.16 and 35.17; the Supreme Court's holding in *Uttecht v. Brown*, 551 U.S. 1, (2007) that a criminal defendant has a right to an impartial jury.

WHEREFORE, PREMISES CONSIDERED, Defendant Shawn Adkins prays that this Court grant this motion in all things, as well as any other relief to which she might be entitled, or alternatively set the instant motion for hearing.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell

State Bar No: 00784782

Email: matt@pptlawgroup.com

Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 8th day of November, 2022.



Matt Powell

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Case Contacts

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CAUSE NO. 8269

CAUSE NO. 8270

THE STATE OF TEXAS	§	IN THE 32 ND DISTRICT COURT
	§	
VS.	§	OF
	§	
SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

BEFORE ME, THE UNDERSIGNED AUTHORITY, personally appeared Kenneth L. Maxwell, Jr., and under oath, stated as follows:

“My name is Kenneth L. Maxwell, Jr. I am a resident of Nolan County, Texas, the County in which the case of the State of Texas v. Shawn Adkins is currently pending. I have resided in Nolan County for 36 years. I am over the age of eighteen and I am fully capable of making this declaration. I am aware of the referenced case. I believe there exists in Nolan County, Texas so great a prejudice against Shawn Adkins that he cannot obtain a fair and impartial trial. I feel this way for the following reasons:

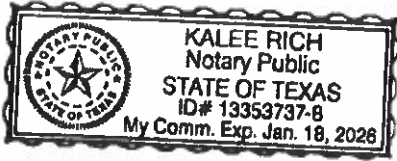
I am aware of significant publicity in both the print and broadcast media relative to the commission of the crime charged herein, the investigation of the offense, the arrest of the defendant and the subsequent charges and indictments. The publicity has been so extensive that it will be impossible to seat a fair and impartial jury.”

Further, affiant sayeth not.


Kenneth L. Maxwell, Jr.

SUBSCRIBED TO AND SWORN TO BEFORE ME, the undersigned authority on the 8th
day of November, 2022.

Kalee Rich
Notary Public, State of Texas

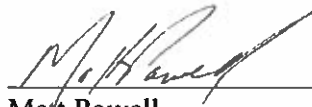


The requested notice and opportunity to investigate the state's proposed evidence is an essential part of Accused's right to a fair trial, effective representation by counsel, constitutional due process, and the right to make a fair rebuttal to the state's case for death, pursuant to provisions of Article I, Sections 10 and 19 of the Constitution of the State of Texas, the Fifth, Sixth, Eighth, and Fourteenth Amendments to the United States Constitution and the principles that underlay the opinion in *Gardner v. Florida*, 430 U.S. 349, 362 (1977) (“[P]etitioner was denied due process of law when the death sentence was imposed, at least in part, on the basis of information which he had no opportunity to deny or explain.”).

WHEREFORE, PREMISES CONSIDERED, Accused requests that the District Attorney timely provide counsel for the Accused with notices of intent to introduce evidence as specified in this request.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 9th day of November, 2022.



Matt Powell

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Erika Zamora on behalf of Matthew Dane Powell
Bar No. 784782
ezamora@pptlawgroup.com
Envelope ID: 70035991
Status as of 11/9/2022 3:41 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
DISTRICT ATTORNEY		richard@32ndda-tx.us	11/9/2022 3:33:39 PM	SENT
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Ginny Rivera

CAUSE NO. 8269

CAUSE NO. 8270

THE STATE OF TEXAS	§	IN THE 32ND DISTRICT COURT
	§	
VS.	§	OF
	§	
SHAWN ADKINS	§	MITCHELL COUNTY, TEXAS

PRETRIAL MATTER
DEFENDANT'S SECOND AMENDED REQUEST FOR DISCOVERY AS
AUTHORIZED BY ARTICLE 39.14 OF THE TEXAS CODE OF CRIMINAL
PROCEDURE

TO THE DISTRICT ATTORNEY OF MITCHELL COUNTY, TEXAS:

COMES NOW, SHAWN ADKINS, the Accused by and through counsel, and files this request for discovery of legally discoverable, but previously undisclosed materials:

I.

The Michael Morton Act directs defense counsel to make requests for discovery to the prosecutor, rather than motions to the court. This request is intended to better comply with the Michael Morton Act.

The state has previously provided discovery to the Defense. The Accused here and now requests only such materials that are legally discoverable, but not yet disclosed. The Accused does not seek to obtain duplicate materials that do not contain any new information.

II.

The Accused requests discovery required to be produced by the State under Article 39.14 of the Texas Code of Criminal Procedure and the principles of due process that

underlay *Brady v. Maryland*, 373 U.S. 83 (1963) and *Kyles v. Whitley*, 514 U.S. 419 (1995) and as expanded in *Watkins v. State*, 619 S.W.3d 265. The *Watkins* Court noted that “the Michael Morton Act did not merely amend a portion of Article 39.14(a); it revamped Article 39.14 completely.” This revamp resulted in “an overhaul of discovery in Texas.” In doing so, the *Watkins* Court explained:

On the whole, the statutory changes broaden[s] criminal discovery for defendants, making disclosure the rule and non-disclosure the exception. Significantly, Article 39.14(h) places upon the State a free-standing duty to disclose all “exculpatory, impeaching, and mitigating” evidence to the defense that tends to negate guilt or reduce punishment. Our Legislature did not limit the applicability of Article 39.14(h) to “material” evidence, so this duty to disclose is much broader than the prosecutor’s duty to disclose as a matter of due process under *Brady vs. Maryland*. This subsection blankets the exact type of exculpatory evidence at issue in the Michael Morton case while creating an independent and continuing duty for prosecutors to disclose evidence that may be favorable to the defense even if that evidence is not “material.” (Internal citations omitted)

The State has an affirmative duty to disclose this evidence that would negate guilt and mitigate punishment. As the *Watkins* Court stated:

Evidence need not by itself prove or disprove a particular fact to be relevant; it is sufficient if the evidence provides a small nudge toward proving or disproving some fact of consequence. Under Article 39.14(h), the State has an affirmative duty to disclose any relevant evidence that tends to negate guilt or mitigate punishment regardless of whether the evidence is “material” under *Brady v. Maryland*.

This request applies to all material in possession, custody, or control of the State or any person under contract with the State, including but not limited to:

1. All reports and applications for arrest and search warrants generated by any law enforcement agency involved in the investigation of this case, as well as the search or arrest warrants themselves.

2. All written or electronically recorded consents to search anything or place given in connection with this case.
3. All statements (whether oral or written) alleged to have been made by the Accused, any codefendants, and all witnesses (including law enforcement officers, unindicted co-conspirators, jailhouse snitches and cooperating witnesses);
4. All video and audio recordings made during the investigation of this case or considered as evidence in this case (such as in-car videos, jail videos, dispatch traffic, 911 calls, etc.), cell phone data, internet search data, Facebook and other social media input and responses, digital data taken from any computer or other electronic device of the Accused or the codefendants or any co-conspirators;
5. Books, accounts, letters to or from the defendant or any codefendants;
6. All photographs and drawings created by the State during its investigation of this case or considered as evidence in this case;
7. All biological material collected as potential evidence in this case;
8. The autopsy report on the deceased, any toxicology report, and related documents and materials;
9. A list of all witnesses the state expects to call at any phase of the trial with their contact data sufficient to permit the defense to locate and interview them;
10. All records of judgments of criminal conviction of the Accused, any codefendants, accomplices, cooperating witnesses, jailhouse snitches, and other witnesses.

11. All records of delinquent conduct by the Accused, including any legal proceedings against or adjudications of the Accused as a juvenile.
12. All written and electronically recorded evidence of extraneous misconduct of the Accused.
13. All other tangible things that constitute or contain evidence material to any matter involved in this case.

The Accused further requests that the State promptly notify the Accused of any newly discovered material and provide copies of said material to the Accused as soon as practicable upon its discovery and that such supplemental discovery continue to be provided until this case is disposed of (except as provided for in paragraph V below).

III.

This request does not apply to the State's work-product or any other material otherwise privileged by law unless disclosure is required by *Brady/Kyles*, supra.

IV.

The Accused is hereby formally requesting the name and address of each person the State may use at trial to present evidence under Rules 702, 703, and 705 of the Texas Rules of Evidence. The Accused requests that such disclosure shall be made no later than the 30th day before the date the voir dire of the prospective jurors begins as provided for by Article 39.14.

V.

If any portion of a document or item subject to this discovery request will be redacted or withheld by the State under paragraph II above, the Accused requests that the State inform him of such redaction or withholding as required by Article 39.14. If any such redaction or withholding occurs, The Accused hereby formally requests that the Court

conduct a hearing and an *in camera* inspection of the redacted or withheld material to determine whether the withholding or redaction is justified under Article 39.14 or any other law.

VI.

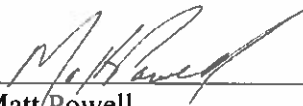
The Accused hereby formally requests that the State disclose any exculpatory, impeachment, or mitigating document, item, or information, in the possession, custody, or control of the State prosecution team that tends to negate the guilt of the Accused or would tend to reduce the punishment for the offense charged.

The Accused further requests that the State promptly supplement any exculpatory, impeachment, or mitigating document, item, or information by disclosing its existence promptly upon its discovery, whether that discovery is made before, during, or after the trial in this matter. See *Ex parte Temple*, No. WR-78,545-02 (Tex. Crim. App. Nov. 23, 2016), *unpublished*.

WHEREFORE, PREMISES CONSIDERED, the Accused requests the District Attorney of Mitchell County to acknowledge receipt of this request and to produce the above requested items of previously undisclosed discovery items as soon as practicable after they first come to hand, and well in advance of the commencement of jury voir dire as required by Article 39.14 of the Texas Code of Criminal Procedure and the authorities cited above.

Respectfully submitted,

Payne, Powell, Truitt & Chandler Law Group
2529 74th Street
Lubbock, TX 79423
Phone: (806) 368-8712
Fax: (806) 731-1502



Matt Powell
State Bar No: 00784782
Email: matt@pptlawgroup.com
Attorney for: Shawn Adkins

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been furnished to counsel for the State on the 9th day of November, 2022.



Matt Powell

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Erika Zamora on behalf of Matthew Dane Powell
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DISTRICT ATTORNEY		richard@32ndda-tx.us	11/9/2022 3:33:39 PM	SENT

Ginny Rivera

CAUSE NO. 8269
CAUSE NO. 8270

THE STATE OF TEXAS

§
§
§
§
§

IN THE 32ND DISTRICT COURT

VS.

OF

SHAWN ADKINS

MITCHELL COUNTY, TEXAS

ORDER ON PRETRIAL MOTION
MOTION FOR CHANGE OF VENUE

Came on to be considered the Defendant's Motion for Change of Venue, and it is hereby granted or denied as indicated below:

[] Granted, and the trial will be moved to a County in the State of Texas outside of Nolan County and that District; namely _____, County, Texas;

[✓] A hearing on the matter will commence at 2:00 a.m./p.m. on the 20 th day of Dec. 2022 in the 32nd District Court Courtroom in Mitchell County, Texas.

[] Denied in all parts.

SIGNED this 10 day of Nov., 2022.


JUDGE PRESIDING

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Envelope ID: 70054637
Status as of 11/10/2022 9:58 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
DISTRICT ATTORNEY		richard@32ndda-tx.us	11/10/2022 9:53:26 AM	SENT
DISTRICT ATTORNEY		maryanne@32ndda-tx.us	11/10/2022 9:53:26 AM	SENT
DISTRICT ATTORNEY		Jordan@32ndda-tx.us	11/10/2022 9:53:26 AM	SENT
Erika Zamora		ezamora@pptlawgroup.com	11/10/2022 9:53:26 AM	SENT
DISTRICT ATTORNEY		suni@32ndda-tx.us	11/10/2022 9:53:26 AM	SENT
Matt Powell		matt@pptlawgroup.com	11/10/2022 9:53:26 AM	SENT
Joshua Somers		joshua.somers@oag.texas.gov	11/10/2022 9:53:26 AM	SENT
Andrew Rountree		Andrew.Rountree@oag.texas.gov	11/10/2022 9:53:26 AM	SENT
Becky Stewart		court32@co.nolan.tx.us	11/10/2022 9:53:26 AM	SENT

Ginny Rivera



**32nd JUDICIAL DISTRICT COURT
NOLAN, MITCHELL & FISHER COUNTIES
JUDGE GLEN HARRISON**

**100 EAST THIRD STREET – SUITE 204
SWEETWATER, TEXAS 79556
(325) 235-3133
(325) 235-4614 (fax)
www.districtcourt32.org**

**Becky Stewart
Court Administrator**

**Daley J. Young
Court Reporter**

November 16, 2022

NOTICE OF SETTING

Case: #8269, 8270 – ST vs. SHAWN CASEY ADKINS;
In the 32nd District Court of Mitchell County, Texas

Hearing: Pre-trial Hearing

Date Set: December 20, 2022

Time Set: 2:00 PM

Location: Nolan County Courthouse
Sweetwater, Texas

c: (via efile)

Richard Thompson, District Attorney
Jordan Magee, Assistant District Attorney
Joshua Somers, Special Assistant District Attorney
Andrew Rountree, Special Assistant District Attorney

Matt Powell, Defense Counsel

32ND DISTRICT COURT DRESS CODE

All persons entering the court are to be dressed appropriately. No sleeveless shirts, shorts, excessively baggy pants, sunglasses, hats of any kind, flip-flop shoes will be allowed in the courtroom. Clothing with pictures; vulgar, racist, sexist, obscene, or suggestive words, or depictions will not be allowed in the courtroom. Counsel shall so instruct parties they represent, witnesses they call and persons accompanying them to the courtroom. Final approval of appropriate dress will be determined by court personnel.

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Status as of 11/16/2022 10:53 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
DISTRICT ATTORNEY		richard@32ndda-tx.us	11/16/2022 9:22:16 AM	SENT
DISTRICT ATTORNEY		maryanne@32ndda-tx.us	11/16/2022 9:22:16 AM	SENT
DISTRICT ATTORNEY		Jordan@32ndda-tx.us	11/16/2022 9:22:16 AM	SENT
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