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**UNITED STATES DISTRICT COURT FOR THE
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES HAFFNER,

Defendant.

CASE NO. 21-MJ-672

**NOTICE OF APPEARANCE,
DEMAND FOR JURY TRIAL,
DEMAND FOR DISCOVERY,
BILL OF PARTICULARS AND
OMNIBUS APPLICATION**

TO: Clerk of the Above-entitled Court; and
TO: U.S. District of Columbia Prosecuting Attorney

PLEASE TAKE NOTICE that the below-named attorney hereby enters his appearance on behalf of the DEFENDANT. THE DEFENDANT HEREBY ENTERS A PLEA OF NOT GUILTY, AND DEMANDS A JURY TRIAL.

FURTHER, PLEASE TAKE NOTICE that, pursuant to the authority of CrR 4.7, CrR 4.7, CrR 6.13(c) (2), ER 705, RCW 10.58.010, 10.37.050, it seq., 46.61.502, .504 and .506, 42.17.260, the Fourth, Fifth, Sixth and Fourteenth Amendments to the United States Constitution, and Article 1, Sections 3, 7, 29, and 30, and the Tenth Amendment to the Washington State Constitution;

THE DEFENDANT HEREBY MAKES THE FOLLOWING DEMANDS, MOTIONS, AND REQUESTS FOR DISCOVERY IN THE MATTER(S) PENDING UNDER THIS cause number:

1 1. Copies of any and all police or investigative reports and statement of claimed
2 experts made in connection with this particular case, including results of physical or mental
3 examinations and scientific test, experiments, or comparisons made in connection with the
4 defendant's arrest;

5 2. That any physical evidence in the custody of the State or its agents be tested for
6 any and al potential evidentiary value in a timely manner, and that all efforts be taken to
7 preserve that evidence from destruction;

8 3. The names and addresses of any and all persons whom the plaintiff intends to call
9 as witnesses at the hearing or trial, together with any and all written or recorded statements,
10 and the substance of any oral statements of such witnesses, together with a summary of the
11 expected testimony of any witness the plaintiff intends to call if the substance of the expected
12 testimony is not contained in the materials otherwise provided;

13 4. Copies of any written or recorded statements and the substance of any oral
14 statement made by the Defendant, and take notice that the Defendant hereby demands a
15 hearing pursuant to CrR 3.5 if the prosecution intends to offer any such statements in its case
16 in chief;

17 5. A list of, copies of, and access to any books, papers, documents, photographs, or
18 tangible objects which the Prosecuting Attorney intends to use in the hearing or trial;

19 6. Any record or prior criminal conviction known to the Prosecuting Attorney of the
20 defendant;

21 7. Any material or information within the Prosecutor's knowledge which tends to
22 negate the defendant's guilt as to the offense charged;

23 8. Any expert witness whom the Prosecuting Attorney will or may call at the
24 hearing or trial, the subject of their testimony, and any reports they have submitted to the
25 Prosecuting Attorney;

9. A copy of any tape recording of radio or telephone communications made over or
through the '911' system and relating to the identity, investigation, detention, arrest and
booking or charging of the defendant;

10. Demands trial within the time period required by CrR 3.3, objects to any trial date
not so set and moves the court for an order setting a speedy trial date;

11. Defendant further objects to the failure of the prosecution to properly verify the
complaint herein, objects to the untimely filing of same and moves to dismiss all charges
ending herein.

1 **YOU ARE FURTHER NOTIFIED** that the failure to comply with these requests
2 will result in the Defendant moving for appropriate relief at time of hearing or trial.

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4 **DATED** This 10th day of February 2022.

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8 Bradley G. Barshis, WSBA #44302
9 Attorney for the Defendant
10 Brad@newtonandhall.com
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