

STATE OF TEXAS ) IN THE DISTRICT COURT  
VS. ) 399TH JUDICIAL DISTRICT  
JOE SMITH ) BEXAR COUNTY, TEXAS

**REQUEST THAT THE STATE PRODUCE AND PERMIT INSPECTION AND  
ELECTRONIC DUPLICATION, COPYING, AND PHOTOGRAPHING  
OF MATERIALS PURSUANT TO ARTICLE 39.14(a) OF  
THE TEXAS CODE OF CRIMINAL PROCEDURE**

TO THE BEXAR COUNTY DISTRICT ATTORNEY::

Joe Smith requests that the State of Texas produce and permit the inspection and the electronic duplication, copying, and photographing by counsel, of the following, as required by article 39.14(a) of the Texas Code of Criminal Procedure:

1. All offense and crime scene reports.
2. All written and recorded statements of the defendant.
3. All written and recorded statements of all witnesses.
4. All documents, papers, books, accounts, letters, photographs, videotapes, electronic recordings, cell phone records, text messages, voice mails, emails, social media content, objects and other tangible things that constitute or contain evidence material to any matter involved in the action that are in the possession, custody, or control of the state or any person under contract with the state, except as prohibited by article 39.15 of the Texas Code of Criminal Procedure, or section 264.408 of the Texas Family Code.
5. The following designated documents and materials:
  - a. All notes, calculations, diagrams, measurements, logs, photographs, videotapes, and reports made by experts and relied upon by the State of Texas in this case..
  - b. All lab and toxicology reports in the possession of the prosecutors handling

this investigation.

- c. All arrest warrants, search warrants, capiases, supporting affidavits, and returns concerning this case.
- d. All photographs and videotapes of the accident scene taken by the San Antonio Police Department and any other State agencies or agents or experts employed by the State of Texas.
- e. All data collected by the State of Texas or any of its agents from EDR, ACM, and any other device in both of the vehicles involved in this accident.
- f. The driving records of Joe Smith, the defendant, and James Brown, the driver of the other car in the accident.
- g. All data and information that the State of Texas has extracted from the cell phones of any persons in this case, including Joe Smith, James Brown, and Mary Brown.
- h. The EMS run sheets of all persons that were involved in this accident and transported to the hospital.
- i. All medical records relating to injuries suffered by James Brown and Mary Brown in this accident.
- j. Photographs taken by the medical examiner and the medical examiner's investigators of the scene or persons injured in this accident.
- k. All 911 calls relating to this accident.
- l. All social media materials and information collected by the State of Texas during its investigation of this case.

Respectfully submitted:

/s/

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Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I certify that a copy of this Motion has been delivered to the Bexar County District Attorney's Office; 101 W. Nueva St.; San Antonio, Texas, on November 19, 2018.