

NO. CR0000

| | | |
|----------------|---|------------------------|
| STATE OF TEXAS |) | IN THE DISTRICT COURT |
| VS. |) | 33RD JUDICIAL DISTRICT |
| JOE SMITH |) | BLANCO COUNTY, TEXAS |

**MOTION FOR PRODUCTION OF THE TRUE NAME
AND CORRECT DATE OF BIRTH
OF PSUEDONYMONOUS COMPLAINANT**

TO THE HONORABLE JUDGE OF SAID COURT:

Joe Smith moves for production of the true name and the correct date of birth for the complainant.

I.

The indictment identifies the complainant as "A1."

II.

Mr. Smith requires the true name and the correct date of birth of the complainant so that he can determine whether the indictments in this case were returned within "ten years from the [complainant's] 18th birthday," as required by Texas law. *See* TEX. CODE CRIM. PROC. ANN. art. 12.01(5).

III.

Additionally, Mr. Smith must know the name of the complainant so that his lawyer can properly investigate this case and render effective assistance of counsel and adequately confront and cross-examine adverse witnesses, as guaranteed by the Sixth and Fourteenth Amendments to the United States Constitution, and Article I, § 10 of the

Texas Constitution.

Respectfully submitted:

MARK STEVENS
310 S. St. Mary's Street
Tower Life Building, Suite 1920
San Antonio, TX 78205-3192
(210) 226-1433
mark@markstevenslaw.com
State Bar No. 19184200

Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of this motion has been mailed to the Blanco County District Attorney's Office; P.O. Box 725; Llano, Texas 78643-0725, on July 12, 2018.

MARK STEVENS

ORDER

On this the ____ day of _____, 2018, came to be considered Defendant's Motion For Production Of The True Name And Correct Date Of Birth For The Psuedonymonous Complainant, and said motion is hereby

(GRANTED)

(DENIED)

JUDGE PRESIDING