

IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

STATE OF OREGON,

PLAINTIFF,

vs.

JOEY GIBSON,

DEFENDANT.

No. 19CR53042

JOSEPH GIBSON'S
DEMAND FOR DISCOVERY
SUPPLEMENTAL NUMBER 3

SUPPLEMENTAL DEMAND FOR DISCOVERY

The defendant, Mr. Joseph Gibson, by and through the Angus Lee Law Firm, PLLC having previously requested discovery, makes the following supplemental demands for discovery:

1. Any video showing or establishing violent conduct committed by Russell Schultz.

2. Any video showing or establishing tumultuous conduct committed by Russell Schultz.

YOU ARE HEREBY NOTIFIED that failure to comply with the demands contained herein will result in defendant, Joey Gibson moving for appropriate relief at time of hearing or trial.

Respectfully submitted this Monday, December 30, 2019.

/s/ D. Angus Lee

D. Angus Lee, WSBA# 36473 *Pro Hoc Vice*
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/s/James L. Buchal

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DEMAND FOR DISCOVERY (SUPP 3)

No. 19CR53042

Monday, December 30, 2019

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GIBSON

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Attorney for Defendant JOSEPH "JOEY"
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1

2

CERTIFICATE OF SERVICE

I, D. Angus Lee, hereby declare under penalty of perjury under the laws of the State of Oregon that the following facts are true and correct:

I am a citizen of the United States, over the age of 18 years.

On Monday, December 30, 2019, I caused this document to be served in the following manner on the parties listed below:

Brad Kalbaugh	()	(BY FIRST CLASS US MAIL)
Multnomah County District Attorney's Office	(X)	(BY E-MAIL)
600 Multnomah County Courthouse	()	(BY FAX)
1021 SW 4th Ave	()	(BY HAND)
Portland OR 97204		
E-mail: brad.kalbaugh@mcda.us		

/s/ D. Angus Lee