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2 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
3 **FOR MULTNOMAH COUNTY**

4 THE STATE OF OREGON,

5 Plaintiff,

No. C 19CR53042

DA 2407866

6 v.

STATE'S MOTION TO COMPEL
DISCOVERY

7 JOSEPH GIBSON,

8 Defendant.

9 Comes now Mike Schmidt, Multnomah County District Attorney, by and through Deputy
10 District Attorney Brad Kalbaugh, and respectfully moves the court for an order compelling the
11 production of discovery in the above referenced case pursuant to ORS 135.835.

12 Specifically, the State requests the following:

- 13 1. The names and addresses of persons, including the defendant, whom the defense
14 intends to call as witnesses at the trial, together with relevant written or recorded
15 statements or memoranda of any oral statements of such persons other than the
16 defendant.
- 17 2. Any reports or statements of experts, made in connection with the particular case,
18 including results of physical or mental examinations and of scientific tests,
19 experiments or comparisons, that the defense intends to offer in evidence at the
20 trial.
- 21 3. Any books, papers, documents, photographs or tangible objects that the defense
22 intends to offer in evidence at the trial.

23 Dated this 29th of December, 2020

24 MIKE SCHMIDT
25 District Attorney
26 Multnomah County, Oregon

27 By: 

28 Brad Kalbaugh, OSB 074335
Deputy District Attorney, Multnomah County

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STATE'S MOTION TO COMPEL DISCOVERY

Multnomah County District Attorney's Office, Portland, OR 97204 - (503) 988-3162

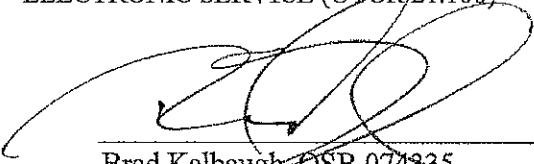
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Certificate of Service

I certify that on September 29, 2021, I caused the foregoing motion to be served upon the parties hereto by the method indicated below, and addressed as follows:

Counsel for Joesph Gibson
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____ HAND DELIVERY
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X ELECTRONIC SERVICE (UTCR 21.100)



Brad Kalbaugh, OSB 074335
Deputy District Attorney