




- (b) Any photographs, drawings or charts made by the police, the District Attorney's office, or anyone else which were made with reference of this Defendant.
- (c) The results of any scientific test made by a State agency or a contract agency at the request of the police or the District Attorney's Office, the result of which would in any manner be material to the guilt or innocence of this Defendant. The Defendant would further show that he has no means of ascertaining the existence of this evidence and the possibility of expert opinion testimony without the disclosures herein sought.
- (d) Any papers, objects or real evidence that is in the possession of the police or District Attorney's office which may in any way be material to the guilt or innocence of this Defendant.
- (e) Any criminal records of any of the witnesses the State plans to call (In conjunction with this request, see specifically Defendant's Motion to List Witnesses.) .
- (f) The criminal records of any co-defendant charged in the indictment the present cause is based on in separate indictments charging the same or a related offense.
- (g) The criminal records of the Defendant.

WHEREFORE, PREMISES CONSIDERED, Defendant prays the Honorable Court to order the State of Texas by and through her prosecuting attorney to produce and permit the inspection of the copying and/or photographing and/or the testing of, by and on behalf of the Defendant, all those items set forth in the foregoing Motion, at a time and place and in such manner as seems right and proper to this Court, and he prays for such other and further orders to which this Court may find him entitled.

Respectfully submitted,



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