LAW OFFICES OF

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September 6, 2011

Marty Cook, Clerk Monroe County Criminal Court Monroe County Courthouse 105 College Street, Suite 3 Madisonville, TN 37354

Madisonville, TN 37354

RE: State of Tennessee v. Jessica Kennedy

**Monroe County Criminal Court No. 11058** 

Dear Ms. Cook:

Please file the enclosed pleadings on behalf of the Defendant in the above captioned cases. They are as follows:

- 1. Motion In Limine No. 1: Restriction of Prosecutor's Argument;
- 2. Motion *In Limine* No. 2: To Prohibit Display of Photographs of the Deceased Either Before or After his Death;
- 3. Memorandum in Support of Motion *In Limine* No. 2: To Prohibit Display of Photographs of the Deceased Either Before or After his Death;
- 4. Motion to Compel Disclosure of Exculpatory Evidence;
- 5. Memorandum of Law in Support of Motion to Compel Disclosure of Exculpatory Evidence;
- 6. Motion to Compel Written Responses to Defendant's Motions;
- 7. Motion Relative to the State's Intention to Use Evidence;
- 8. Motion to Place All Bench Conferences and In-chambers Conferences on the Record:
- 9. Specific Brady Motion No. 1;
- 10. Motion to Compel Disclosure of the Existence and Substance of Promises of Immunity, Leniency or Preferred Treatment;

<sup>\*</sup> Certified as a Criminal Trial Specialist by the Tennessee Commission on CLE and Specialization and the National Board of Trial Advocacy Rule 31 Listed General Civil and Family Mediator

- 11. Memorandum of Law in Support of Motion to Compel Disclosure of the Existence and Substance of Promises of Immunity, Leniency or Preferred Treatment;
- 12. Motion for Reasonable, Written Pretrial Notice of Any Impeaching Conduct Relating to the Accused;
- 13. Motion for Pretrial Written Notice of Any Impeaching Conviction Relating to the Accused;
- 14. Motion for State Agents to Retain Rough Notes;
- 15. Motion for Pretrial Disclosure of Any and All Video and/or Audio Taped Statements;
- 16. Motion for Disclosure of All Statements which the State will Seek to Attribute to the Defendant;
- 17. Memorandum of Law in Support of Motion for Disclosure of All Statements which the State will Seek to Attribute to the Defendant:
- 18. Motion for Uncharged Conduct on Which the State Intends to Rely at Trial;
- 19. Memorandum in Support of Motion for Uncharged Conduct on Which the State Intends to Rely at Trial;
- 20. Motion for Leave to File Further Motions;
- 21. Motion for Early Production of "Jencks" Statements;
- 22. Defendant's Motion for Change of Venue;
- 23. Motion to Suppress; and
- 24. Motion for Specific Discovery #1.

Thank you for your attention to these matters.

Sincerely yours,

James H. Stutts Jessica Kennedy

Enclosures

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