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| DISTRICT Court, ADAMS County, Colorado Court Address: 1100 Judicial Center Drive  Brighton, CO 80601 DATE F | ILED: November 27, 2017 9:37 AM ID: 3A2E3A30AE2D9  UMBER: 2017CR2407   COURT USE ONLY  |
| PEOPLE OF THE STATE OF COLORADO, FILING  Plaintiff CASE N  v.  MONIKA FIRMAN,  Defendant |
| Douglas K. Wilson, Colorado State Public Defender Lindsey Watson #44043  Deputy Public Defender  Brighton Regional Public Defenders  4710 East Bromley Lane, Brighton CO 80601  Phone: (303) 659-4274 Fax: (303) 659-6935  E-mail: [brighton.defenders@state.co.us](mailto:brighton.defenders@state.co.us) | Case No. 17CR2407  Div. No. F |
| **MOTION FOR DISCOVERY RELATING TO EXPERTS** | |

Ms. Firman by and through counsel, moves this Court to order the prosecution to provide defense counsel, with the following materials and information:

1. The names and addresses of all witnesses the prosecution intends to qualify as experts;
2. The specific field of expertise about which the witness will testify;
3. All reports and statements, including oral statements made in connection with this particular case, of all witnesses described in subparagraph A, above;
4. All documents, reports, and information on this case which the witness is considering in the formulation of expert opinion;
5. The formal education, technical training, experience and other factors which serve as a basis for the witness's qualification as an expert;
6. Any grades, evaluations or ratings received by the witness as to education, training or practical experience in the field of expertise; and
7. All books, manuals, articles, journals, reports, studies or other literature used or relied upon by the witness in the formulation of expert opinion in this case.

As grounds, the defendant asserts the following:

1. Such discovery is mandated or authorized by the Colorado Rules of Criminal Procedure 16(I)(a)(1)(III) and (IV), (a)(2) and (d)(1).
2. The requested discovery is discoverable, as it is relevant, potentially exculpatory and necessary to preparation of the defense. *Brady v. Maryland*, 373 U.S. 83 (1963); *Chambers v. People*, 682 P.2d 1173 (Colo. 1984)
3. The defendant will be denied rights of due process, confrontation and effective assistance of counsel if the requested materials and information are not provided.

WHEREFORE, Ms. Firman respectfully moves for an Order directing the prosecution to provide the above materials and information no later than the motions hearing, pursuant to the Fifth, Sixth and Fourteenth Amendment to the United States Constitution and Article II, §§ 16 and 25 of the Colorado Constitution otherwise Ms. Firman will be deprived of her rights to a fair trial, due process, effective assistance of counsel, confrontation and her right to prepare a defense.

/s/ Lindsey Watson

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| Lindsey Watson, #44043 Deputy State Public Defender  Dated: November 27, 2017 | **Certificate of Service**  I certify that on  11/27/17 , I served the foregoing document by delivering via ICCES\_x mailing faxing same to all opposing counsel.  /s/ Lindsey Watson |