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Mon July 12, 2021

Re: State v. Brandon Demond Barry [29299][Lamar]

Gary Young, Esq.
Office of the Lamar County & District Attorney

Dear Mr. Gary Young,

I represent Brandon Demond Barry [“Defendant”] in the captioned matter. Per Tex. Code Crim. Proc. Art. 39.14, *Watkins v. State*, 619 S.W.3d 265 (Tex. Crim. App. 2021), reh'g denied (Apr. 14, 2021), *Kyles v. Whitley*, 514 U.S. 419, 115 S. Ct. 1555, 131 L. Ed. 2d 490 (1995) and *United States v. Agurs*, 427 U.S. 97, 96 S. Ct. 2392, 49 L. Ed. 2d 342 (1976), holding modified by *United States v. Bagley*, 473 U.S. 667, 105 S. Ct. 3375, 87 L. Ed. 2d 481 (1985) I specifically designate the following for production to me as his counsel:

1. The A/V recording of any and all custodial interrogations of Mr. Barry.
2. Each and every written *Miranda* waiver authored by Mr. Barry.
3. Each and every *filemarked, fully executed* search warrant affidavit and associated search warrant and return utilized in the investigation resulting in the allegations herein.

4. Each and every *filemarked, fully executed* affidavit for arrest warrant and its associated arrest warrant for the arrest of Mr. Barry resulting in the charges herein.
5. All body worn camera and other media depicting the March 24, 2021 forced entry to 210 Stone Avenue, Apt. 57, Paris, TX.
6. The complete file on “CI#337” who is alleged by the State to have been employed by law enforcement on February 2, 2021 to engage in a purchase of controlled substance from Mr. Barry, to include his [i] identity, [ii] criminal history record information [CHRI], [iii] history of compensation by law enforcement - *whether monetary or otherwise* - in return for his informant activity, and [iv] the identity of the person or organization who maintains this file of information. It appears from the discovery produced to date that the February 2, 2021 transaction described above is the basis for the March 24, 2021 arrest of Mr. Barry herein.
7. The serial number of any and all weapons allegedly recovered at 210 Stone Avenue, Apt. 57, Paris, TX on March 24, 2021 and any and all results of investigation into the ownership records of any such weapon.
8. Any and all media images of any and all weapons allegedly recovered at 210 Stone Avenue, Apt. 57, Paris, TX on March 24, 2021.

Respectfully submitted,

 /s/ G. Donald Haslam, Jr.
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CERTIFICATE OF SERVICE

The undersigned certifies that on Mon July 12, 2021 a true and exact copy of the foregoing was served on the office of the Lamar County District Attorney according to the terms of Rule 3 of the *Statewide Rules Governing Electronic Filing in Criminal Cases*, as amended.

 /s/ G. Donald Haslam, Jr.
G. Donald Haslam, Jr.