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2009 FEB -2 PM 2: 54

VIRLYNN TINNELL
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6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MOHAVE**

8 STATE OF ARIZONA,

9 Plaintiff,

10 vs.

11 **WARREN STEED JEFFS,**

12 Defendant.

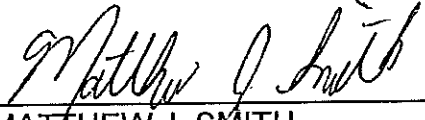
No. CR2007-0743 & CR2007-0953

RESPONSE TO MOTION
FOR DISCLOSURE OF AUDIO
AND VIDEO RECORDINGS

13 COMES NOW, the State of Arizona, by the Mohave County Attorney, and
14 hereby responds to Defendant's Motion for Disclosure of Audio and Video Recordings.
15 During a pre-trial interview conducted by the defense in this case with Sheriff David
16 Doran of Schleicher County, Sheriff Doran advised that he had some recording
17 equipment on at the onset of the search warrant conducted by Texas authorities on
18 April 3, 2008. Sheriff Doran was not familiar with the equipment provided to him, but
19 believes it is possible that some audio and/or video recordings were made at the
20 start of the search warrant. The State does not disagree with the defense's position
21 that they should be entitled to receive a copy of those recordings. However, these
22 are not recordings that are within the control of the Mohave County Attorney's Office
23 or the State of Arizona. The State will make attempts to get copies of this information
24 from the State of Texas. However, since this material is not within the possession
25 or control of the State of Arizona, the State cannot guarantee its production but will

1 merely make it's best efforts to receive these potential recordings.

2
3 RESPECTFULLY SUBMITTED THIS 2nd day of February, 2009.

4 
5 _____
6 MATTHEW J. SMITH
7 MOHAVE COUNTY ATTORNEY

8 A copy of the foregoing
9 sent this same day to:

10 HONORABLE STEVEN F. CONN
11 SUPERIOR COURT JUDGE

12 A copy of the foregoing e-mailed and
13 mailed this same day to:

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