

IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS,

vs.

STATE OF TENNESSEE,
RESPONDENT.

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No. 17-CR-10-PC

STATE OF TENNESSEE'S RESPONSE TO PETITIONER ADAMS'
MOTION FOR LEAVE TO ADD AMENDMENT TO
POST CONVICTION RELIEF PETITION

COMES NOW, the State of Tennessee, through the undersigned attorneys and submits this *Response to Petitioner Adams' Motion for Leave to Add Amendment to Post Conviction Relief Petition*. The State would state as follows:

1. The State highly disputes Petitioner Adams' stated reason that the ATM video, which Petitioner Adams' trial counsel obtained possession of in discovery in June 2015 (and Petitioner Adams' post-conviction counsel has had in his possession since Fall 2023) is newly obtained information warranting the filing of a 30-page amendment on the eve of this hearing.
2. However, the State is not asking this Court for a continuance and stands ready to proceed on May 19, 2025.
3. If this Court allows Petitioner Adams to add the amendment to his post-conviction relief petition, the State would state that all allegations contained in the amendment are denied and the State demands strict proof thereof.

FILED 15 DAY OF May, 2025 AT 1:56 AM PM
BY Tammie Wolfe, CLERK
Tammie Wolfe
CLERK

Respectfully Submitted:

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been emailed to Douglas Bates IV and Crystal M. Etue, attorneys for Petitioner Adams, on this 15th day of May, 2025.

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