

**IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE**

ZACHARY RYE ADAMS,)	
PETITIONER,)	
)	
vs.)	No. 17-CR-10-PC
)	
STATE OF TENNESSEE,)	
RESPONDENT.)	

**STATE'S RESPONSE TO PETITIONER ADAMS' MOTION TO RELEASE
KATIE SPIRKO FROM STATE'S WITNESS LIST OR ALTERNATIVELY
COMPEL THE STATE TO CALL HER AS A WITNESS IF SEQUESTERED**

COMES NOW, the State of Tennessee, by and through the undersigned attorneys, and files this response to Petitioner Adams' *Motion to Release Katie Spirko from State's Witness List or Compel the State to Call her as a Witness if Sequestered*, and in support thereof:

1. Petitioner Adams does not have standing to make this motion and it should be denied accordingly.
2. In the alternative, it is not possible to know what Petitioner Adams' witnesses will testify to at the hearing. Given Katie Spirko's evolving titles and roles in this case, there are several scenarios that might trigger her testimony.
3. There is no authority for Petitioner Adams' request that the State be compelled to call her – or anyone else - as a witness.

FILED 15 DAY OF May, 2025 AT 1:56 AMPM
BY Tammie Wolfe TAMMIE WOLFE, CLERK (CLERK)

WHEREFORE, PREMISES CONSIDERED, the State of Tennessee would respectfully request that this Honorable Court:

1. Deny Petitioner Adams's *Motion to Release Katie Spirko from State's Witness List or Compel the State to Call her as a Witness if Sequestered.*
2. For any general or specific relief that the State of Tennessee is entitled to.

Respectfully Submitted:

/s/ Amy P. Weirich /

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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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