ZACHARY RYE ADAMS,	·)	
PETITIONER,)	
)	ı
vs.)	No. 17-CR-10-PC
)	FILED T DAY OF TUD JODG AT 1 M AM RA
STATE OF TENNESSEE,)	TAMMIE WOLFE, CLERK
RESPONDENT.)	BY Thrillyht, BUSULY CLERK
		U /

STATE OF TENNESSEE'S MOTION FOR PRETRIAL PRODUCTION OF DOCUMENTS AND OBJECTS

COMES NOW, the State of Tennessee, through counsel of record, now comes before the Court pursuant to Tenn. R. Crim. P. 17(c) and requests that the Court direct the clerk to issue a subpoena duces tecum for the production of certain items before the Court at a time prior to trial. This motion aims to allow the parties to inspect the requested items before their introduction into evidence, thereby avoiding any delays.

The State of Tennessee would request pretrial production of materials from the following individuals:

- 1. Jennifer Lynn Thompson (see attached Exhibit "1" for subpoena and items list).
- 2. Jim Simmons (see attached Exhibit "2" for subpoena and items list).
- 3. Jerry Gonzales (see attached Exhibit "3" for subpoena and items list).
- 4. Katie Spirko (see attached Exhibit "4" for subpoena and items list).

The State of Tennessee would submit that the items are evidentiary in nature and relevant, they are not otherwise procurable by the State of Tennessee in advance of trial, and that the State cannot properly prepare for trial without such production and inspection in advance of trial.

Respectfully Submitted:

/s/ Amy P. Weirich /

Amy P. Weirich, BPR (014441)
Special Counsel
25th Judicial District
P.O. Box 38
Somerville, Tennessee 38068
(901) 465-7351
apweirich@tndagc.org

/s/ Christopher V. Boiano /

Christopher V. Boiano, BPR (030076)
Assistant Attorney General
18th Judicial District
113 West Main Street
Cordell Hull Building, 3rd Floor.
Gallatin, Tennessee 37066
(615) 451-5810
evboiano@tndagc.org

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been emailed and mailed to Douglas Bates IV, attorney for Petitioner Adams, on this 7th day of February 2025.

Douglas Thompson Bates, IV
Bates & Bates Law Office
406 W. Public Sq., 2nd Floor, Bates Building
P.O. Box 1
Centerville, TN 37033
dtbates4@bates.law

/s/ Christopher V. Boiano /

Christopher V. Boiano

Exhibit "1"

Circuit Court Hardin County, Savannah Tennessee	SUBPOENA	Case Number 17-CR-10-PC
Zachary Rye Adams [Plaintiff's Nam	vs. State of Tennessee [Defendant's Name]]
To:	Jennifer Lynn Thompson	_
, , , , , , , , , , , , , , , , , , , 	810 Broadway #305, Nashville, TN 37203	
og og skaller en skall En jedning skaller en	Phone: 615-320:4344 Email: nashvilleattorney@gmail.com	
in Savannah Tennessee, on	commanded: ring or Trial – to appear personally before the Circu at a.m./p.m., and give testimore cedure; when you arrive, you must remain at the court un	ny, pursuant to Rule 45.01 and
copying, testing, or sampling of the followings: Please see attached list "SUBPOE authentic to the best of your knowledge, in to Rule 45.02 of the Tennessee Rules of Communication of Communications and the sampling of the Tennessee Rules of Communication of Communications and the sampling of the sampl	mentary Evidence (Books, Papers, Documents, etc.) — to wing designated books, papers, documents, electronicall ENA DUCES TECUM ITEMS TO PRODUCE. and to swear or another another and to swear or another another and to swear or another anot	affirm that the things produced are ethings have been produced, pursuant at
Procedure; and/or	ata.m./p.m., pursuant to Rule 45	
4. Subpoena for Deposition Testimon	ry - to appear personally ata.m./p.m., then and there	to testify by deposition in this matter,
and to bring the following items:	approximate	total and the second se
Notice for a subposed for production of	pursuant to Ru	a for deposition testimony (#4
above). The failure to serve an objection	on to this subpoena within twenty-one days after the d the right to seek the reasonable cost for producing boo	ay of service of the subpoena waives
This subpoena is issued on behalf of Plain attorney are:	ntiff or Defendant . The name, address, and telepho	one number of the issuing party's
Signature of issuing party's attorney:	,	
Date Issued:	Signature of Clerk/Depu	ty Clerk
	For Americans With Disa	abilities Act (ADA) assistance only,

C:	SUBPOENA	Case Number
Circuit Court Hardin County, Savannah Tennessee	SODIOEIM	17-CR-10-PC
Zachary Rye Adams [Plaintiff's Name]	vs. State of Tennessee	lame]
		2249 4 7 7 1 2 2 4 7 1 2
The second secon		
· .	RETURN OF SERVICE	1
☐ 1. I certify that on the date indicated b	such person must sign in the signature box below I served a copy of this subpoena on (state	/
2. I was unable to serve a copy of this	s subpoena on the person named in the subpoen	a because
☐ 3. I acknowledge being served with the	his subpoena on the date indicated below.	
FOR RETURN BY ATTORNEY OR ATTAGENT:	TORNEY'S DATE OF SERVICE:	The second of the second of
Sworn to and subscribed before me on thi		CER, ATTORNEY OR ATTORNEY'S ACKNOWLEDGING SERVICE:
☐ Notary Public or ☐ Deputy Clerk:		1
	A Comment of the Comm	

)	,
)	1
·)	
)	No. 17-CR-10-PC
)	1
)	
) .	1
)))))

SUBPOENA DUCES TECUM ITEMS TO PRODUCE

TO: Jennifer Lynn Thompson
The Law Office of Jennifer Lynn Thompson
810 Broadway #305
Nashville, TN 37203
615-320-4344
nashvilleattorney@gmail.com

- 1. The complete case file relating to State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 2. All statements and memos relating to witnesses or potential witnesses or persons connected with State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 3. All documents, tape recordings, or other writings memorializing or in any way recording or reflecting any words, statements, declarations, conversations, or other communications by Zachary Rye Adams.
- 4. All documents, tape recordings, or other writings memorializing or in any way recording or reflecting any words, statements, declarations, conversations, or other communications by Jason Autry.
- 5. Any and all letters, notes, memoranda, or writing of any kind related to State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 6. All photographs, letters, statements, recordings, videotapes, audiotapes, documents, disks, or digital files that relate to Zachary Rye Adams.

- 7. All photographs, letters, statements, recordings, videotapes, audiotapes, documents, disks, or digital files that relate to Jason Autry.
- 8. All computers, laptops, hard drives, backups, and computer information storage devices that you have in your possession related to any legal work representation in *State of Tennessee vs. Zachary Rye Adams* (Hardin County Circuit Court Case No. 17-CR-10)
- 9. All records and notations of communications, or records which memorialize or relate to any communications or contact, between Jennifer L. Thompson and Zachary Adams, including telephone records, telephone notes, manual logs, e-mails, or memoranda.
- 10. Copies of any and all documents pertaining to Zachary Rye Adams.
- 11. Every signed Application for Membership in the Criminal Justice Act Defense Panel for the United States District Court for the Middle District of Tennessee since January 1, 2015.

Exhibit "2"

Circuit Court Hardin County, Savannah Tennessee	SUBPOENA	A	Case Number 17-CR-10-PC
Zachary Rye A	1001110	State of Tennessee Defendant's Name	
To:	Jim Simmons		
	P.O. Box 2934, Hendersanville, TN	37075	pro man
	Phone: 615-477-9987 Email: jas52@ea	urthlink,net	· · · · · · · · · · · · · · · · · · ·
Under penalty prescribed by law, you 1. Subpoena for Attendance at 1	Hearing or Trial - to appear personally b	perfore the Circuit Co	OURT of Hardin County, 465 Main S
in Savannah Tennessee, on	at a.m./p.m.,	and give testimony, pt	insuant to Rule 45.01 and
45.05 of the Tennessee Rules of Civil you to leave;	I Procedure; when you arrive, you must rem	nain at the court until the	Judge or a court officer allows
conving, testing, or sampling of the f	ocumentary Evidence (Books, Papers, Do following designated books, papers, docum POENA DUCES TECUM ITEMS TO PRO	nents, electronically stor	luce and permit inspection, red information, or tangible
□ 3 Subposes for Inspection of Pro	on or beforeat emises – to permit inspection of the follow atam./p.m., pu	ing premises:	;
Procedure; and/or			
☐ 4. Subpoena for Deposition Testin	mony – to appear personally at a.m./p.	in_	· · · · · · · · · · · · · · · · · · ·
Tennessee, on	, ata.m./p.	m., then and there to tes	tify by deposition in this matter,
and to bring the following items:	- 17	bulg 45	Od of the Tannessee Pules of
Civil Procedure.		, pursuant to Rule 45	.04 of the Tennessee Rules of
above): The failure to serve an obje	on of documentary evidence (#2 above) ection to this subpoena within twenty-one ept the right to seek the reasonable cost to tangible things.	e days after the day of :	service of the subpoena waive
	Plaintiff or Defendant . The name, ad		
	N a	'	
Date Issued:	Cinnat	ure of Clerk/Deputy Cle	rk
	Signat	are of Cicin/Deputy Cic	147
		nericans With Disabilitie	es Act (ADA) assistance only,

Circuit Court Hardin County, Savannah Tennessee	Sub	POENA	1	Case Number 17-CR-10-PC
Zachary Rye Adams [Plaintiff's Name]	VS.	State of Ter [Defendant's N		
			F The same	
		The second secon	1 1 1 1	
<u> </u>	RETURN O	OF SERVICE	,	
Check one of the following boxes: Box 1 agent; pursuant to Tenn. Code Ann. § 23-2-1 person named in the subpoena (or the author and 1. I certify that on the date indicated place and manner of service):	05, the return by an at rized representative of such person must sign below I served a copy	torney of the attorney's a fan organization named in in the signature box belong	n the subpoow!	ity of the person served, and the
☐ 2. I was unable to serve a copy of this	s subpoena on the per	son named in the subpoer	na because	
☐ 3. I acknowledge being served with t			:	
FOR RETURN BY ATTORNEY OR AT AGENT:	FORNEY'S	DATE OF SERVICE:	1	-
Sworn to and subscribed before me on the		SIGNATURE OF OFFI AGENT, OR PERSON	CER, ATT	TORNEY OR ATTORNEY'S /LEDGING SERVICE:
□ Notary Public or □ Deputy Clerk:	**************************************		1	•
My Commission Expires:	P. Carrowski, T.	,	,	

ZACHARY RYE ADAMS,)	1
PETITIONER,)	
	,) .	
vs.	.) .	No. 17-CR-10-PC
)	
STATE OF TENNESSEE,)	1
RESPONDENT.)	,
	,	

SUBPOENA DUCES TECUM ITEMS TO PRODUCE

TO: Jim Simmons

Attorney at Law
P.O. Box 2934
Hendersonville, TN 37077-2934
615-477-9987
jas52@carthlink.net

- 1. The complete case file relating to State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 2. All statements and memos relating to any witnesses or potential witnesses or persons connected with *State of Tennessee vs. Zachary Rye Adams*, Hardin County Circuit Court Case No. 17-CR-10.
- 3. All documents, tape recordings, and other writings memorializing or in any way recording or reflecting any words, statements, declarations, conversations, or other communications with or by Zachary Rye Adams.
- 4. Any and all letters, notes, emails, memoranda, or writing of any kind related to *State of Tennessee vs. Zachary Rye Adams*, Hardin County Circuit Court Case No. 17-CR-10.
- 5. All computers, laptops, hard drives, backups, and computer information storage devices that you have in your possession related to any legal work performed by you in *State of Tennessee vs. Zachary Rye Adams* (Hardin County Circuit Court Case No. 17-CR-10).

Exhibit "3"

Circuit Court Hardin County, Savannah Tennessce	SUBPOENA	Case Number 17-CR-10-PC
Zachary Rye Ada [Plaintiff's Na		
То:	Jerry Gonzales	
	8000 State Hwy 99, Rockvale, TN 37153	**************************************
	Phone: (615) 360-6060 Email: jgonzalez@jglaw.net	
Under penalty prescribed by law, you as □ 1. Subpoena for Attendance at He	re commanded: <u>varing or Trial</u> – to appear personally before the Ci	rcuit Court of Hardin County, 465 Main Str
in Savannah Tennessee, on	ata.m./p.m., and give tes	timony, pursuant to Rule 45.01 and
	rocedure; when you arrive, you must remain at the cou	
copying, testing, or sampling of the foll things: Please see attached list "SUBPO	umentary Evidence (Books, Papers, Documents, etc. lowing designated books, papers, documents, electron DENA DUCES TECUM ITEMS TO PRODUCE" and to sweat information, and belief, and to state whether all respo	nically stored information, or tangible in or affirm that the things produced are
to Rule 45.02 of the Tennessee Rules of	f Civil Procedure; the subpoenaed items must be prod on or beforeat	alm/p.m.;
Procedure; and/or	ata.m./p.m., pursuant to Ru	le 45.02 of the Tennessee Rules of Civil
in the second		:
Tennessee on	an /p.m. then and t	here to testify by deposition in this matter,
and to bring the following items:	ony – to appear personally at a.m./p.m., then and t	
	pursuant t	o Rule 45.04 of the Tennessee Rules of
Civil Procedure.		
above): The failure to serve an object	of documentary evidence (#2 above) or for a subpion to this subpoena within twenty-one days after the right to seek the reasonable cost for producing tangible things.	he day of service of the subpoena waives
	aintiff 🗆 or Defendant 🗅. The name, address, and tel	
	No.	
Date Issued:	Signature of Clerk/L	Deputy Clerk
•	For Americans With call: 731-925-8166	Disabilities Act (ADA) assistance only,

Circuit Court Hardin County, Savannah Tennessee	St	UBPOENA		Case Number 17-CR-10-PC
Zachary Rye Adams [Plaintiff's Name]		vs. State of Tennessee [Defendant's N	ame]	
	`		A decision to	
			- 1	
	RETUR	N OF SERVICE	1	
agent; pursuant to Tenn. Code Ann. § 23-2-10 person named in the subpoena (or the authorizand signal of the authorizand signal signal of the authorizand signal of the authori	zed representativ uch person must elow I served a c	ve of an organization named in t sign in the signature box belo copy of this subpoena on (state	the subpo w. the identi	ty of the person served, and th
☐ 2. I was unable to serve a copy of this s	subpoena on the		a because	
□ 3. I acknowledge being served with thi				
FOR RETURN BY ATTORNEY OR ATTORNEY OR ATTORNEY	ORNEY'S	DATE OF SERVICE:	1 1 1	
Sworn to and subscribed before me on this, 20	day of	SIGNATURE OF OFFIC AGENT, OR PERSON A	ER, ATT	ORNEY OR ATTORNEY'S LEDGING SERVICE:
☐ Notary Public or ☐ Deputy Clerk:				

My Commission Expires:

ZACHARY RYE ADAMS, PETITIONER,)	
)	77 '45 CD 40 DC
vs.)	No. 17-CR-10-PC
)	
STATE OF TENNESSEE,)	
RESPONDENT.)	,
		1

SUBPOENA DUCES TECUM ITEMS TO PRODUCE

TO: Jerry Gonzales

Attorney at Law
8000 State Hwy 99
Rockvale, TN 37153
jgonzalez@jglaw.net

- 1. The complete case file relating to State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 2. All statements and memos relating to any witnesses or potential witnesses or persons connected with *State of Tennessee vs. Zachary Rye Adams*, Hardin County Circuit Court Case No. 17-CR-10.
- 3. All documents, tape recordings, and other writings memorializing or in any way recording or reflecting any words, statements, declarations, conversations, or other communications with or by Zachary Rye Adams.
- 4. Any and all letters, notes, emails, memoranda, or writing of any kind related to State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 5. All computers, laptops, hard drives, backups, and computer information storage devices that you have in your possession related to any legal work performed by you in *State of Tennessee vs. Zachary Rye Adams* (Hardin County Circuit Court Case No. 17-CR-10).

Exhibit "4"

Circuit Court Hardin County, Savannah Tennessee	SUBPOENA	Case Number 17-CR-10-PC
Zachary Rye Adams	vs. State of Tennessee [Defendant's Name	
[Plaintiff's Nan	ne] [Defendant's Name	eJ
To:	Katie Osborn Spirko	
·	551 Bonerwood Drive, Nashville, TN 37201	,
	Phone: (615) 961-2349 Ernail: katie.spirko@facts.care	·
Under penalty prescribed by law, you are	e commanded: uring or Trial – to appear personally before the Circu	uit Court of Hardin County, 465 Main St
in Sevenneh Tennessee on	ata.m./p.m., and give testimo	ony, pursuant to Rule 45.01 and
45.05 of the Tennessee Rules of Civil Proyou to leave;	ocedure; when you arrive, you must remain at the court u	ntil the judge or a court officer allows
to Rule 45.02 of the Tennessee Rules of	and to swear or information, and belief, and to state whether all responsive Civil Procedure; the subpoenaed items must be produce	d at
□ 4 Subposus for Deposition Testimor	uv – to appear personally at	in
Tennessee, on	<u>uv</u> – to appear personally at a.m./p.m., then and there	e to testify by deposition in this matter,
and to bring the following items:	, pursuant to R	tule 45.04 of the Tennessee Rules of
Civil Procedure.	, parodant to	
Notice for a subpoena for production	of documentary evidence (#2 above) or for a subpoen on to this subpoena within twenty-one days after the o the right to seek the reasonable cost for producing bo angible things.	day of service of the suppoena waives
This subpoena is issued on behalf of Pla attorney are:	intiff or Defendant o. The name, address, and teleph	none number of the issuing party's
Signature of issuing party's attorney:		
Date Issued:	Signature of Clerk/Dep	uty Clerk
	For Americans With Dis	sabilities Act (ADA) assistance only,

Circuit Court Hardin County, Savannah Tennessee	SUBPOENA	Case Number 17-CR-10-PC
Zachary Rye Adams [Plaintiff's Name]	vs. State of Tennessee [Defendant's Nan	ne]
	RETURN OF SERVICE	
agent; pursuant to Tenn. Code Ann. § 23-2-10: person named in the subpoena (or the authoriz	Box 2 is only for the return by an authorized of 5, the return by an attorney or the attorney's agenced representative of an organization named in the signature box below	nt must be sworn to. Box 3 is only for the subpoena) who acknowledges service

Agent; pursuant to Tenn. Code Ann. § 23-2-105, the return by an attorney or the attorney's agent must be sworn to. Box 3 is only for the person named in the subpoena (or the authorized representative of an organization named in the subpoena) who acknowledges service, and such person must sign in the signature box below.

1.1 certify that on the date indicated below I served a copy of this subpoena on (state the identity of the person served, and the place and manner of service):

2.1 was unable to serve a copy of this subpoena on the person named in the subpoena because

3.1 acknowledge being served with this subpoena on the date indicated below.

FOR RETURN BY ATTORNEY OR ATTORNEY'S AGENT:

Sworn to and subscribed before me on this _____ day of _____.

AGENT:

Sworn to and subscribed before me on this _____ day of _____.

Notary Public or Deputy Clerk:

My Commission Expires:

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

SUBPOENA DUCES TECUM ITEMS TO PRODUCE

TO: Katie Osborn Spirko
551 Bonerwood Drive
Nashville, TN 37201
(615) 961-2349
Katie spirko@facts.care

- 1. Please bring any and all documents and records (or true and correct copies thereof) provided to you or to any third party at your request or direction as part of your involvement with Zachary Rye Adams or any subject matter related to State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10, or these post-conviction proceedings.
- 2. Please bring a copy of the professional guidelines that you consider as governing you for your work in this post-conviction case. If more than one organization's guidelines apply, please bring all applicable.
- 3. Please provide a list of all cases in which you have given expert testimony either in-person or by deposition in the past five (5) years.
- 4. Please bring a copy of all papers submitted for publication or to fulfill academic requirements including, but not limited to, your dissertation.
- 5. Please bring a copy of the case file in your possession for State of Tennessee vs. Zachary Rye Adams, Hardin County Circuit Court Case No. 17-CR-10.
- 6. All computers, laptops, hard drives, backups, and computer information storage devices that you have in your possession, related to *State of Tennessee vs. Zachary Rye Adams* (Hardin County Circuit Court Case No. 17-CR-10) or the post-conviction proceedings (Hardin County Circuit Court Case No. 17-CR-10-PC).

- 7. All documents, tape recordings, other writings memorializing or in any way recording or reflecting any words, statements, declarations, conversations, or other communications with Jason Autry.
- 8. All documents, tape recordings, or other writings memorializing or in any way recording or reflecting any words, statements, declarations, conversations, or other communications with Zachary Rye Adams.
- 9. All documents, tape recordings, or other writings memorializing or in any way recording or reflecting any works, statements, declarations, conversations, or other communications between you and Jennifer Thompson.
- 10. Please provide a copy of any employment contract that you have with Zachary Rye Adams.