

IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS,
PETITIONER,

vs.

STATE OF TENNESSEE,
RESPONDENT.

No. 17-CR-10-PC

FILED 7 DAY OF Feb 2025 AT 1⁰⁰ AM PM

BY Tami Wright, Deputy TAMMIE WOLFE, CLERK
CLERK

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
cvboiano@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
<div style="display: flex; justify-content: space-between;"> Zachary Rye Adams vs. State of Tennessee </div> <div style="display: flex; justify-content: space-between; font-size: small;"> [Plaintiff's Name] [Defendant's Name] </div>		

To:

Jennifer Lynn Thompson
 810 Broadway #305, Nashville, TN 37203
 Phone: 615-320-4344 | Email: nashvilleattorney@gmail.com

Under penalty prescribed by law, you are commanded:

☐ 1. Subpoena for Attendance at Hearing or Trial – to appear personally before the Circuit Court of Hardin County, 465 Main Street in Savannah Tennessee, on _____ at _____ a.m./p.m., and give testimony, pursuant to Rule 45.01 and 45.05 of the Tennessee Rules of Civil Procedure; when you arrive, you must remain at the court until the judge or a court officer allows you to leave;

☒ 2. Subpoena for Production of Documentary Evidence (Books, Papers, Documents, etc.) – to produce and permit inspection, copying, testing, or sampling of the following designated books, papers, documents, electronically stored information, or tangible things: Please see attached list "SUBPOENA DUCES TECUM ITEMS TO PRODUCE" and to swear or affirm that the things produced are authentic to the best of your knowledge, information, and belief, and to state whether all responsive things have been produced, pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; the subpoenaed items must be produced at _____ on or before _____ at _____ a.m./p.m.;

☐ 3. Subpoena for Inspection of Premises – to permit inspection of the following premises: _____ on _____ at _____ a.m./p.m., pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; and/or

☐ 4. Subpoena for Deposition Testimony – to appear personally at _____ in _____ Tennessee, on _____, at _____ a.m./p.m., then and there to testify by deposition in this matter, and to bring the following items: _____, pursuant to Rule 45.04 of the Tennessee Rules of Civil Procedure.

Notice for a subpoena for production of documentary evidence (#2 above) or for a subpoena for deposition testimony (#4 above): The failure to serve an objection to this subpoena within twenty-one days after the day of service of the subpoena waives all objections to the subpoena, except the right to seek the reasonable cost for producing books, papers, documents, electronically stored information, or tangible things.

This subpoena is issued on behalf of Plaintiff ☐ or Defendant ☐. The name, address, and telephone number of the issuing party's attorney are: _____

Signature of issuing party's attorney: _____

Date Issued: _____

Signature of Clerk/Deputy Clerk _____

For Americans With Disabilities Act (ADA) assistance only, call: 731-925-8166

NOTICE: YOU CAN BE FOUND IN CONTEMPT OF COURT FOR FAILING TO COMPLY WITH THIS SUBPOENA AND IF FOUND GUILTY OF CONTEMPT YOU MAY BE FINED, IMPRISONED, OR BOTH.

(This is a general form subpoena. The party issuing the subpoena is responsible for complying with any provision of law imposing additional notice requirements that apply to the pending case or to the type of records being sought under this subpoena.)

Circuit Court Hardin County, Savannah Tennessee	SUBPOENA	Case Number 17-CR-10-PC
Zachary Rye Adams vs. State of Tennessee <div style="display: flex; justify-content: space-between;"> [Plaintiff's Name] [Defendant's Name] </div>		

RETURN OF SERVICE	
<p>Check one of the following boxes: Box 1 or Box 2 is only for the return by an authorized officer, by an attorney, or by an attorney's 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.</p> <p><input type="checkbox"/> 1. I 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): _____</p> <p><input type="checkbox"/> 2. I was unable to serve a copy of this subpoena on the person named in the subpoena because _____</p> <p><input type="checkbox"/> 3. I acknowledge being served with this subpoena on the date indicated below.</p>	
FOR RETURN BY ATTORNEY OR ATTORNEY'S AGENT: Sworn to and subscribed before me on this ____ day of _____, 20____. <input type="checkbox"/> Notary Public or <input type="checkbox"/> Deputy Clerk: My Commission Expires:	DATE OF SERVICE: SIGNATURE OF OFFICER, ATTORNEY OR ATTORNEY'S AGENT, OR PERSON ACKNOWLEDGING SERVICE:

(This is a general form subpoena. The party issuing the subpoena is responsible for complying with any provision of law imposing additional notice requirements that apply to the pending case or to the type of records being sought under this subpoena.)

IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS,
PETITIONER,

vs.

STATE OF TENNESSEE,
RESPONDENT.

No. 17-CR-10-PC

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	Case Number 17-CR-10-PC
<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <u>Zachary Rye Adams</u> [Plaintiff's Name] </div> <div style="text-align: center;"> vs. </div> <div style="text-align: center;"> <u>State of Tennessee</u> [Defendant's Name] </div> </div>		

To:

Jim Simmons
P.O. Box 2934, Hendersonville, TN 37075
Phone: 615-477-9987 | Email: jas52@earthlink.net

Under penalty prescribed by law, you are commanded:

☐ 1. Subpoena for Attendance at Hearing or Trial – to appear personally before the Circuit Court of Hardin County, 465 Main Street in Savannah Tennessee, on _____ at _____ a.m./p.m., and give testimony, pursuant to Rule 45.01 and 45.05 of the Tennessee Rules of Civil Procedure; when you arrive, you must remain at the court until the judge or a court officer allows you to leave;

☐ 2. Subpoena for Production of Documentary Evidence (Books, Papers, Documents, etc.) – to produce and permit inspection, copying, testing, or sampling of the following designated books, papers, documents, electronically stored information, or tangible things: Please see attached list "SUBPOENA DUCES TECUM ITEMS TO PRODUCE" and to swear or affirm that the things produced are authentic to the best of your knowledge, information, and belief, and to state whether all responsive things have been produced, pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; the subpoenaed items must be produced at _____ on or before _____ at _____ a.m./p.m.;

☐ 3. Subpoena for Inspection of Premises – to permit inspection of the following premises: _____ on _____ at _____ a.m./p.m., pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; and/or

☐ 4. Subpoena for Deposition Testimony – to appear personally at _____ in _____ Tennessee, on _____, at _____ a.m./p.m., then and there to testify by deposition in this matter, and to bring the following items: _____, pursuant to Rule 45.04 of the Tennessee Rules of Civil Procedure.

Notice for a subpoena for production of documentary evidence (#2 above) or for a subpoena for deposition testimony (#4 above): The failure to serve an objection to this subpoena within twenty-one days after the day of service of the subpoena waives all objections to the subpoena, except the right to seek the reasonable cost for producing books, papers, documents, electronically stored information, or tangible things.

This subpoena is issued on behalf of Plaintiff ☐ or Defendant ☐. The name, address, and telephone number of the issuing party's attorney are: _____

Signature of issuing party's attorney: _____

Date Issued: _____

Signature of Clerk/Deputy Clerk

For Americans With Disabilities Act (ADA) assistance only,
call: 731-925-8166

NOTICE: YOU CAN BE FOUND IN CONTEMPT OF COURT FOR FAILING TO COMPLY WITH THIS SUBPOENA AND IF FOUND GUILTY OF CONTEMPT YOU MAY BE FINED, IMPRISONED, OR BOTH.

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IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS,
PETITIONER,

vs.

STATE OF TENNESSEE,
RESPONDENT.

No. 17-CR-10-PC

SUBPOENA DUCES TECUM ITEMS TO PRODUCE

TO: Jim Simmons
Attorney at Law
P.O. Box 2934
Hendersonville, TN 37077-2934
615-477-9987
jas52@earthlink.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 Tennessee	<h1 style="margin: 0;">SUBPOENA</h1>	Case Number 17-CR-10-PC
<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <u>Zachary Rye Adams</u> <small>[Plaintiff's Name]</small> </div> <div style="text-align: center;"> vs. </div> <div style="text-align: center;"> <u>State of Tennessee</u> <small>[Defendant's Name]</small> </div> </div>		

To:

Jerry Gonzales
8000 State Hwy 99, Rockvale, TN 37153
Phone: (615) 360-6060 | Email: jgonzalez@jglaw.net

Under penalty prescribed by law, you are commanded:

☐ 1. Subpoena for Attendance at Hearing or Trial – to appear personally before the Circuit Court of Hardin County, 465 Main Street in Savannah Tennessee, on _____ at _____ a.m./p.m., and give testimony, pursuant to Rule 45.01 and 45.05 of the Tennessee Rules of Civil Procedure; when you arrive, you must remain at the court until the judge or a court officer allows you to leave;

☒ 2. Subpoena for Production of Documentary Evidence (Books, Papers, Documents, etc.) – to produce and permit inspection, copying, testing, or sampling of the following designated books, papers, documents, electronically stored information, or tangible things: Please see attached list "SUBPOENA DUCES TECUM ITEMS TO PRODUCE"
 _____ and to swear or affirm that the things produced are authentic to the best of your knowledge, information, and belief, and to state whether all responsive things have been produced, pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; the subpoenaed items must be produced at _____ on or before _____ at _____ a.m./p.m.;

☐ 3. Subpoena for Inspection of Premises – to permit inspection of the following premises: _____ on _____ at _____ a.m./p.m., pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; and/or

☐ 4. Subpoena for Deposition Testimony – to appear personally at _____ in _____, Tennessee, on _____, at _____ a.m./p.m., then and there to testify by deposition in this matter, and to bring the following items: _____, pursuant to Rule 45.04 of the Tennessee Rules of Civil Procedure.

Notice for a subpoena for production of documentary evidence (#2 above) or for a subpoena for deposition testimony (#4 above): The failure to serve an objection to this subpoena within twenty-one days after the day of service of the subpoena waives all objections to the subpoena, except the right to seek the reasonable cost for producing books, papers, documents, electronically stored information, or tangible things.

This subpoena is issued on behalf of Plaintiff ☐ or Defendant ☐. The name, address, and telephone number of the issuing party's attorney are: _____

Signature of issuing party's attorney: _____

Date Issued: _____

Signature of Clerk/Deputy Clerk _____

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Circuit Court Hardin County, Savannah Tennessee	<h2 style="margin: 0;">SUBPOENA</h2>	Case Number 17-CR-10-PC
<div style="display: flex; justify-content: space-between;"> <u>Zachary Rye Adams</u> vs. <u>State of Tennessee</u> </div> <div style="display: flex; justify-content: space-between; font-size: small;"> [Plaintiff's Name] [Defendant's Name] </div>		

<h3 style="margin: 0;">RETURN OF SERVICE</h3>	
<p>Check one of the following boxes: Box 1 or Box 2 is only for the return by an authorized officer, by an attorney, or by an attorney's 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.</p> <p><input type="checkbox"/> 1. I 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): _____</p> <p><input type="checkbox"/> 2. I was unable to serve a copy of this subpoena on the person named in the subpoena because _____</p> <p><input type="checkbox"/> 3. I acknowledge being served with this subpoena on the date indicated below.</p>	
FOR RETURN BY ATTORNEY OR ATTORNEY'S AGENT: Sworn to and subscribed before me on this ____ day of _____, 20 ____. <input type="checkbox"/> Notary Public or <input type="checkbox"/> Deputy Clerk: My Commission Expires: _____	DATE OF SERVICE: _____ SIGNATURE OF OFFICER, ATTORNEY OR ATTORNEY'S AGENT, OR PERSON ACKNOWLEDGING SERVICE: <div style="height: 100px; border-bottom: 1px solid black;"></div>

(This is a general form subpoena. The party issuing the subpoena is responsible for complying with any provision of law imposing additional notice requirements that apply to the pending case or to the type of records being sought under this subpoena.)

IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS,
PETITIONER,

vs.

STATE OF TENNESSEE,
RESPONDENT.

)
)
)
)
)
)
)

No. 17-CR-10-PC

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	<h2 style="margin: 0;">SUBPOENA</h2>	Case Number 17-CR-10-PC
<div style="display: flex; justify-content: space-between;"> Zachary Rye Adams vs. State of Tennessee </div> <div style="display: flex; justify-content: space-between; font-size: small;"> [Plaintiff's Name] [Defendant's Name] </div>		

To:

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

Under penalty prescribed by law, you are commanded:

☐ 1. Subpoena for Attendance at Hearing or Trial – to appear personally before the Circuit Court of Hardin County, 465 Main Street in Savannah Tennessee, on _____ at _____ a.m./p.m., and give testimony, pursuant to Rule 45.01 and 45.05 of the Tennessee Rules of Civil Procedure; when you arrive, you must remain at the court until the judge or a court officer allows you to leave;

☒ 2. Subpoena for Production of Documentary Evidence (Books, Papers, Documents, etc.) – to produce and permit inspection, copying, testing, or sampling of the following designated books, papers, documents, electronically stored information, or tangible things: Please see attached list. "SUBPOENA DUCES TECUM ITEMS TO PRODUCE"
 _____ and to swear or affirm that the things produced are authentic to the best of your knowledge, information, and belief, and to state whether all responsive things have been produced, pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; the subpoenaed items must be produced at _____ on or before _____ at _____ a.m./p.m.;

☐ 3. Subpoena for Inspection of Premises – to permit inspection of the following premises: _____ on _____ at _____ a.m./p.m., pursuant to Rule 45.02 of the Tennessee Rules of Civil Procedure; and/or

☐ 4. Subpoena for Deposition Testimony – to appear personally at _____ in _____, Tennessee, on _____, at _____ a.m./p.m., then and there to testify by deposition in this matter, and to bring the following items: _____, pursuant to Rule 45.04 of the Tennessee Rules of Civil Procedure.

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This subpoena is issued on behalf of Plaintiff ☐ or Defendant ☐. The name, address, and telephone number of the issuing party's attorney are: _____

Signature of issuing party's attorney: _____

Date Issued: _____

 Signature of Clerk/Deputy Clerk

For Americans With Disabilities Act (ADA) assistance only,
 call: 731-925-8166

NOTICE: YOU CAN BE FOUND IN CONTEMPT OF COURT FOR FAILING TO COMPLY WITH THIS SUBPOENA AND IF FOUND GUILTY OF CONTEMPT YOU MAY BE FINED, IMPRISONED, OR BOTH.

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Circuit Court Hardin County, Savannah Tennessee	<h2 style="margin: 0;">SUBPOENA</h2>	Case Number 17-CR-10-PC
<div style="display: flex; justify-content: space-between;"> Zachary Rye Adams vs. State of Tennessee </div> <div style="display: flex; justify-content: space-between; font-size: small;"> [Plaintiff's Name] [Defendant's Name] </div>		

<h3 style="margin: 0;">RETURN OF SERVICE</h3>	
<p>Check one of the following boxes: Box 1 or Box 2 is only for the return by an authorized officer, by an attorney, or by an attorney's 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.</p> <p><input type="checkbox"/> 1. I 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): _____</p> <p><input type="checkbox"/> 2. I was unable to serve a copy of this subpoena on the person named in the subpoena because _____</p> <p><input type="checkbox"/> 3. I acknowledge being served with this subpoena on the date indicated below.</p>	
FOR RETURN BY ATTORNEY OR ATTORNEY'S AGENT: Sworn to and subscribed before me on this ____ day of _____, 20____. <input type="checkbox"/> Notary Public or <input type="checkbox"/> Deputy Clerk: My Commission Expires: _____	DATE OF SERVICE: _____ SIGNATURE OF OFFICER, ATTORNEY OR ATTORNEY'S AGENT, OR PERSON ACKNOWLEDGING SERVICE: <div style="height: 100px; border-bottom: 1px solid black;"></div>

(This is a general form subpoena. The party issuing the subpoena is responsible for complying with any provision of law imposing additional notice requirements that apply to the pending case or to the type of records being sought under this subpoena.)

**IN THE CIRCUIT COURT OF HARDIN COUNTY
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**ZACHARY RYE ADAMS,
PETITIONER,**

vs.

**STATE OF TENNESSEE,
RESPONDENT.**

No. 17-CR-10-PC

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.