

## THOUGHTS FOR CHURCH

- 1) IF TED HIRED SOMEBODY HE WOULD HAVE BEEN AT PRECISION FABRICS AT 3:00 PM
- 2) IT IS WAY UNDER 15 MIN FROM CREEKRIDGE + RANDOLMAN TO BRANDON CT VIA I-85, 421 AND 22 (ALLIANCE CH RD)
- 3) IT IS 12.7 MI FROM LYLES TO BRANDON STA VIA COLISEUM BLVD, FREEMAN MILL RD, I-40, I-85, 421 AND 22. DRIVE TAKES LESS THAN 15 MIN.
- 4) ASK CHURCH IF PARDRE SAID IN A PRIOR STATEMENT THAT HE TOLD TED TO GET A SCANNER W/ A DIFF. FREQUENCY.
- 5) WHAT IS BASIS FOR CHURCH TELLING TED ON 10/19/95 THAT RONNIE WAS THE LAST PERSON TO SEE PATRICIA ALIVE

(1) Mr. Church, did you get to look over Coliseum Blvd. and Freeman Mill Road last night?

Then you still don't know whether there is continuous *4-lane* road from Lyles to within 4 miles of Brandon Station Court?

(2) You recall *Nancy Young*, the woman who worked with Patricia at Cinnamon Ridge?

In your investigation, did you learn that Ms. Young is acquainted with both the Kimbles and the Stumps?

You interviewed Nancy Young on October 12, 1995?

She told you Patricia:

- Came to work at 9:40 a.m.
- Had lunch with Ted and returned to office at 1:15
- Left work at 3:30
- Ted called her at 3:20

Interviewed her again on August 15, 1996.

She said Patricia returned to work before 1400 hours.

You told Nancy Young that "None of the Kimble family would cooperate with me in the case."

(3) Show Church the phone record from Judy Stump - make Church admit that he called Judy the night that Ronnie was in Lynchburg at the Whiddens.

Did Church know Ronnie was going to be there and was the call a set up?

(4) What was the basis for Church telling people that Ronnie was the *last person to see Patricia alive?*

(November 2 telephone call from Church to Ted at Lyles).

(5) The gun - what was Church's part in the decision not to ask for sophisticated fingerprint analysis?

(Refer to picture of gun).

(Refer to picture of *door jamb*).

Show dead bolt.

(6) Remind Church that he previously testified Patricia was terrified of *intruders*.

She was last person to leave house morning of October 9, 1995. She would have locked dead bolt.

Obviously, dead bolt was not forced.

Either Patricia or Ted or somebody with Ted's keys unlocked dead bolt.

How does Church know that it was not *Ted*?

(7) In June of 1996 Church had information that a witness ID'd a person who looked like Ronnie near Brandon Station Court at 6:20 p.m. October 9, 1995. (June 6 photo lineup memo).

Show that this *piece of info* appeared in *both* Djadseck and Whidden's interviews.

(8) Mr. Church, please name and identify the people who were on the premises of Lyles on October 9, 1995 between the hours of noon and 5:00 p.m.

(Ted, Patricia, Ronnie, Ogburn, Swainey, Billy Smith)

What time do you know each of them were there?

What time do you *think* they left?

As *boss*, Ted came and went freely, didn't he?

CHURCH

Have him *ID* the personal paper *found* in *kitchen*.

Get him to rule out Ted's writing based upon his conclusion that Ted "found" Patricia's signature on the insurance application.

Make Church ID the will and notes, the Sam letter, etc.

**LOSE THIS FIGHT GRACEFULLY!**

After we lose voir dire of will papers, request that Panosh be precluded from making any reference to the papers in final argument.