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**STATE OF NORTH CAROLINA
COUNTY OF GUILFORD**

**IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION**

97CRS39580;81

STATE OF NORTH CAROLINA)
)
 v.)
)
THEODORE MEAD KIMBLE,)
RONNIE LEE KIMBLE,)
 Defendants)

**DISCOVERY
MEMORDANDUM
(Number 2)**

NOW COMES the State of North Carolina and acknowledges receipt of Defendants' request for voluntary discovery. In response to the Defendant request, the State of North Carolina has prepared copies of the following documents, said copies are available to pick up at the District Attorney's Office.

1. Copies of tape recorded statements of Theodore Mead Kimble.
2. Telephone records of Lyles Building supply, 21 pages.
3. Niel Silverthorne interview of 6/13/96
4. Statement of Laura Shephard, 4/18/96
5. Interview with Ronnie Lee Kimble 7/25/96
6. Interview with Ronnie Lee Kimble 10/30/95
7. Justin Dobesh Interview (3 pages)
8. State Bureau of Investigation report re: measurements at crime scene
9. State Bureau of Investigation report re: physical evidence seized at crime scene.
10. Advice of rights, Ronnie Lee Kimble April 1, 1997.
11. Statement of Winn Dixie witness.
12. August 26, 1997, statement of Jerry Leander Poe.
13. April 18, 1997, agreement and disclosure, Robert H. Nicholes.
14. October 30, 1997, agreement and disclosure for Patrick R. Pardee.
15. July 31, 1997 statement of Patrick Pardee.
16. July 21, 1997 statement of Patrick Pardee..
17. May 9, 1997 statement of Larry Stephen Swaney.
18. June 27, 1997 witness statement.
19. April 2, 1997 statement of Patrick Pardee (4 pages) ?
20. April 2, 1997 statement of Patrick Pardee (4 pages) ?

21. April 3, 1997 statement of Patrick Pardee (2 pages) ?
22. April 10, 1997 statement of Patrick Pardee (2 pages) ?
23. Statements of Defendants (corrected or additional)
24. Fingerprint results: The Guilford County Sheriff's Department has analyzed the documents seized at Lyles Building supple and has determined that Theodore Mead Kimble's fingerprints were found on at least 3 documents related to sniper rifles, bomb-making and thwarting a policed investigation. Full report will be provided when available.

Copies of all photographs, video tapes and audio tapes pertaining to the investigation will be available at the District Attorney's Office for review.

In the event that there are other specific requests, the State of North Carolina will voluntarily respond to each request.

The State will voluntarily provide any additional items of discovery and any exculpatory or Brady materials which come into the possession of the State of North Carolina. The State acknowledges its continuing duty to disclose any discoverable or exculpatory materials which come to the attention of the State.

Additionally, discovery of any items presently held as evidence by the Guilford County Sheriff's Department can be obtained by contacting and arranging for an opportunity to inspect the items. Items of physical evidence can be inspected pursuant to reasonable safeguards and only if the Defendant waives the chain of custody from the point the Defendant's counsel inspects the evidence to the introduction of the evidence at trial. Please prepare and present a suitable waiver to the District Attorney's Office for the 18th Judicial District or the Guilford County Sheriff's Department.

This Monday, November 03, 1997.



Richard E. Panosh
Assistant District Attorney