

[Exhibit A]

IN THE CRIMINAL COURT OF SHELBY COUNTY, TENNESSEE

STATE OF TENNESSEE

VS.

No. 16645
(Murder)

JAMES EARL RAY, Alias

FILED *2/16/68*
J. A. BLACKWELL, CLERK
BY *E. E. [illegible]* D C.

MOTION TO PRODUCE

Comes the defendant in the above styled case, by and through his attorney of record, and respectfully moves This Honorable Court to require the attorney for the State to produce to the attorney for defendant, and allow him to inspect and/or duplicate, books, papers, documents or tangible objects obtained from or belonging to the defendant or obtained from others which are in possession of, or under the control of the attorney for the State or any law enforcement officer, including, but not limited to the following, to-wit:

1. Any firearm or other weapon belonging to defendant or allegedly used in committing the crime charged.
2. Any automobile allegedly owned or operated by defendant and any and all objects found therein.
3. Records of or documents pertaining to any hotel, motel, rooming house or other purported place of residence, temporary or permanent, of defendant or others.
4. All photographs purportedly showing defendant or others caught in connection with the crime herein charged.
5. Any and all penal records and files of defendant, including any and all medical, optometric, or psychiatric reports.

16. Maps, papers or other objects purportedly used or handled by defendant.

17. Logs and records of calls made over the radio network of any law enforcement agency of Shelby County, Tennessee, during the period of April 4, 1968 through April 5, 1968.

18. The names and addresses of all witnesses for the State in this cause.

19. Any and all statements, signed or unsigned, attributed to or purportedly made by defendant and any and all statements made in the presence of defendant to which note of his reaction was made.

20. Autopsy and toxicologists reports concerning any alleged victim of the crime charged herein.

21. The minutes and notes of Grand Jury proceedings in this case.

Respectfully submitted,

RICHARD J. RYAN
Attorney for Defendant

I hereby certify that I have personally served a copy foregoing motion upon the Attorney General for the State in this case. This the ____ day of _____, 1970.

RICHARD J. RYAN

5. Any and all penal records and files of defendant, including any and all medical, optometric, or psychiatric reports contained therein or produced while defendant was in custody of any authority.

6. Any and all military records of defendant, including results of medical, optometric, or psychiatric tests and results of proficiency tests.

7. Passports, visas and applications therefore.

8. Records of entry and exit to and from this or any other country.

9. Documents, records or objects pertaining to transportation of or travel by defendant.

10. Evidence and test fingerprints of defendant.

11. Any sets of fingerprints used or displayed in any search for defendant.

12. Any fingerprints of defendant or other persons found on tangible objects named or produced herein.

13. Ballistic and weapons tests and reports thereof.

14. Expended slugs from a firearm, or fragments thereof.

15. Bullets, hulls, shells or casings, expended or unexpended.

to the previous attorneys.

6. Most of said evidence was given to Clerk of Court by an Order of Judge Battle dated March 13, 1969. A copy of this Order is appended as Exhibit D to this motion.

Therefore, it is prayed that this Honorable Court will order its Clerk to produce to the attorneys for defendant, and allow them to inspect and/or duplicate all items listed in Exhibit D to this motion;

And, it is prayed further that this Honorable Court will order the Attorney for the State to produce to the attorneys for defendant, and allow them to inspect and/or duplicate, books, papers, documents or tangible objects obtained from or belonging to the defendant or obtained from others which are in possession of, or under the control of the attorney for the State or any law enforcement officer, including, but not limited to the following, to wit:

1. Any firearm or other weapon belonging to defendant or allegedly used in committing the crime charged.

2. Any and all objects found in any automobile allegedly owned or operated by defendant.

3. Records of or documents pertaining to any hotel, motel, rooming house or other purported place of residence, temporary or permanent, of defendant or others.

4. All photographs purportedly showing defendant or others sought in connection with the crime herein charged.

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.....

MOTION FOR PRODUCTION OF BOOKS,
PAPERS, DOCUMENTS AND TANGIBLE
OBJECTS

1. On August 16, 1968, Mr. Arthur Hanes, Sr., then attorney for defendant, filed with this court a motion to produce for inspection and/or copying certain tangible evidence in this case. A copy of this motion is appended as Exhibit A to this motion.

2. On August 30, 1968, the District Attorney General of Tennessee answered the above motion. A copy of this Answer is appended as Exhibit B to this motion.

3. On September 18, 1968, the Honorable W. Preston Battle issued an Order granting this motion, except for the ballistics and weapons tests and reports thereof. A copy of this Order is appended as Exhibit C to this motion.

4. Defendant's present attorneys of record are J. S. [unclear] of Savannah, Georgia, Richard J. Ryan of Memphis, Tenn., and Bernard Fensterwald, Jr. of Washington, D.C.

5. Said Defense Attorneys are desirous of inspecting and/or copying the tangible evidence made available by the Court.

TO: DIRECTOR, FBI (44-38861)

FROM: SAC, MEMPHIS (44-1987)

SUBJECT: MURKIN

Documents filed in Criminal Court of Shelby County,
Tenn., by attorneys for the subject RAY.

(Two copies each of 7 documents).

RE: Memphis airtel to Bureau, 6/18/70.

274
ENCLOSURE

44-38861-5885

12/5/74
AB

10-5-74
274