

**IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO**

STATE OF OHIO

**vs**

**TERREIONNA S. PASCHAL**

**CASE NO: CR-2023-05-1679**

**JUDGE BREAU**

## REQUEST FOR DISCOVERY

Now comes the Defendant, **TERREIONNA S. PASCHAL**, by and through the undersigned counsel and hereby respectfully requests all discovery pursuant to Rule 16 of the Ohio Rules of Criminal Procedure and the Sixth and Fourteenth Amendments to the United States Constitution, including items that are material to the preparation of a defense, or are intended for use by the prosecuting attorney as evidence at the trial, or were obtained from or belong to the defendant, within the possession of, or reasonably available to the State, including but not limited to the following:

**1. STATEMENT OF THE DEFENDANT AND CO-DEFENDANT – Crim.**  
**R. 16(B)(1)**

All relevant written or recorded statements, or copies thereof, made by the Defendant or a co-defendant, including police summaries of such statements, and including grand jury testimony by either the defendant or co-defendant.

**2. CRIMINAL RECORD(S) OF DEFENDANT, CO-DEFENDANT(S), AND WITNESS(ES) – Crim. R. 16(B)(2)**

A copy of Defendant's prior criminal record as well as the criminal record of any co-defendant and/or witness associated with the instant matter that would be admissible under Rule 609 of the Ohio Rules of Evidence of a witness in the state's case-in-chief, or that is reasonably anticipates calling as a witness in rebuttal or surrebuttal. For purposes of this request, a "witness" shall include any person who has or claims to have knowledge or is

believed to have knowledge concerning a fact or facts about the issue(s) involved in this criminal action or proceeding or about the credibility of another witness, irrespective of whether the State of Ohio intends to call such person as a witness at trial. See generally 4 O.J.I. § 521.04.

**3. DOCUMENTS AND TANGIBLE OBJECTS – Crim. R. 16(B)(3)**

All laboratory or hospital reports, books, papers, tangible objects, photographs, buildings or places or copies or portions, subject only to Crim. R. 16(D)(4) and Crim. R. 16(E).

**4. REPORTS OF EXAMINATIONS AND TESTS – Crim. R. 16(B)(4)**

Any results or reports of physical or mental examinations and of experiments or scientific tests, made in connection with the above-captioned case or copies, subject only to Crim. R. 16(D)(4) and Crim. R. 16(E).

**5. EVIDENCE FAVORABLE TO DEFENDANT –  
Crim. R. 16(B)(5), U.S. Const. Amends. VI and XIV**

All evidence or information known or which may become known to the State of Ohio which may be favorable to Defendant and material to guilt or punishment, including information or evidence which could be used to obtain evidence that would diminish the credibility of any State's witness, as well as material relevant to either guilt or punishment. "[E]vidence that would diminish the credibility of any State's witness" includes, without limitation, plea bargains, pardons, grants of clemency, grants of immunity, informal or formal promises to speak on behalf of another in a legal proceeding, whether such accommodations have been extended on behalf of the witness or on behalf of a family member, friend or associate of the witness.



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**6. POLICE REPORTS – Crim. R. 16(B)(6)**

All reports from peace officers, the Ohio State Highway Patrol, and federal law enforcement agents, both original and supplemental, the existence of which may be known or may become known to the State of Ohio and that are associated with the above-captioned matter.

**7. WITNESS STATEMENTS – Crim. R. 16(B)(7)**

All written or recorded statements, or copies thereof, made by a witness in the State's case-in-chief, or that it reasonably anticipates calling as a witness in rebuttal or surrebuttal. For purposes of this request, a "witness" shall include any person who has or claims to have knowledge or is believed to have knowledge concerning a fact or facts about the issue(s) involved in this criminal action or proceeding or about the credibility of another witness, irrespective of whether the State of Ohio intends to call such person as a witness at trial. See generally 4 O.J.I. § 521.04.

**8. WITNESS NAMES AND ADDRESSES – Crim. R. 16(I)**

A written list of the names and addresses of all witnesses that the State of Ohio intends to call in its case-in-chief, or reasonably anticipates calling in rebuttal or surrebuttal.

**9. EXPERT WITNESSES; REPORTS – Crim R. 16(K)**

All written reports summarizing an expert witness's testimony, findings, analysis, conclusion, or opinion, and shall include a summary of the expert's qualifications. Respectfully, this request is continuing in nature. If, subsequent to compliance with this request, the State of Ohio discovers additional responsive materials, those materials shall promptly be transmitted to Defendant. In the event the State refuses to transmit such materials, the State of Ohio shall advise Defendant of its noncompliance to allow for



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determination of the discoverability of the withheld materials, pursuant to Crim. R. 16(C) and/or Crim. R. 16(D)(1)-(5) and/or Crim. R. 16(E)(1), (2).

Respectfully submitted,

/S/ Jeff R. Laybourne

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#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been delivered by the Court's E-filing System this 14<sup>th</sup> day of June, 2023, to the Summit County Prosecutor's Office.

/S/ Jeff R. Laybourne

Jeff R. Laybourne, 0079867

Attorney for Defendant