

DATE; December 3, 1986

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

VS.

VIC FEAZELL

§
§
§
§
§

CRIMINAL NO. A-86-CR-94

DEFENDANT'S REQUEST FOR DISCLOSURE
OF EXCULPATORY AND MITIGATING EVIDENCE

TO: JAN PATTERSON, Assistant U.S. Attorney for the Western District
of Texas, Austin Division.

Pursuant to Rule 16, T.R.C.P., VIC FEAZELL respectfully requests the right to be informed of, furnished with, inspect, copy or photograph the following, which are either in the government's possession, custody or control, the existence of which is known to you or by the exercise of due diligence may become known to you:

I.

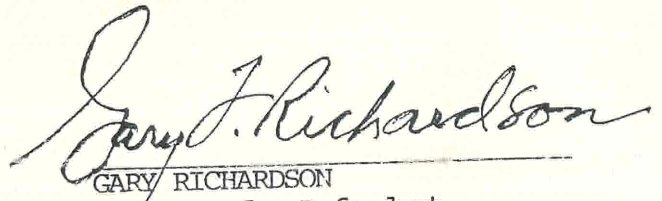
All facts, matter, and evidence that are exculpatory, mitigating, and material as to the defendant's guilt or innocence of the offenses for which he is indicted, and all facts, matter, and evidence material to the credibility of any witnesses that the attorneys for the government believe might testify against VIC FEAZELL, including but not limited to, any bias, agreement with, motive, or payment of any such witnesses or any social, economic, political, or other connection or relation of such witnesses with any person or organization interested in the trial or outcome of the trial of VIC FEAZELL, or any mental or physical defect or infirmity of any witness or any drugs or medication taken by any such witness or witnesses during any time relevant to these proceedings.

II.

NOTICE: This Request for Disclosure is not intended to waive in any way defendant's rights under his motions presently pending before the U.S. District Court and before the United States Fifth Circuit Court of Appeals concerning the Attorney Client Privilege/Work Product Materials illegally seized by the government, including, but not limited to, reports, memoranda and internal defense documents made by the defendant at the direction of his attorneys or by agents made in connection with the investigation or defense of this case or of statements made by the defendant, or by government or defense witnesses to the defendant, VIC FEAZELL, or his attorneys or agents under the 6th Amendment to the United States Constitution and F.R.C.P. 16(b)(2).

III.

MR. FEAZELL further requests that you, the said JAN PATTERSON, advise his undersigned counsel by letter within ten (10) days hereafter as to whether you will refuse to comply with the above request or any part thereof in order that there will be ample time prior to the trial herein to present any such refusal to the Court.



GARY RICHARDSON
Attorney for Defendant
Bar No. 16863500
7030 S. Yale, Suite 601
Tulsa, Oklahoma 74136
918/492-7674

JEFF KEARNEY
Bar No. 11139500
606 One Tandy Center
Ft. Worth, Texas 76102

CERTIFIED MAIL NO. P 223 352 611

cc: District Clerk for the Western District of Texas, Austin Division
Honorable Judge James R. Nowlin