



crimes, wrongs, or acts other than the offense or offenses charged in this case. The accused specifically requests notice of the following with respect to each and every alleged crime, wrong, and act the State intends to introduce under this Rule:

- a. Name of the alleged victim;
  - b. Date of the alleged crime, wrong, or act;
  - c. County of the alleged crime, wrong, or act;
  - d. Description of the alleged crime, wrong, or act; and
  - e. Names and contact information for all witnesses to the alleged crime, wrong, or act.
  - f. And all discovery the accused is entitled to under 39.14 Tex. Code. Crim. Proc. Regarding the alleged crime, wrong, or act.
4. **Notice of withheld evidence or information:** Pursuant to 39.14(c) TEX CODE CRIM PROC, should any document, item, or information be withheld as not being subject to discovery, the accused requests notice that such item, document, or information is withheld or redacted, so that the accused may request a hearing to determine whether withholding or redaction is justified under any law.

**NOTE:** This includes conversations between a prosecutor/investigator and a witness. *See Pope v. State*, 207 S.W.3d 352, 358 (Tex. Crim. App. 2006)(“descriptions of potential witnesses and statements that would reveal whether the party had spoken to potential witnesses are not work product and are discoverable.”)

**Respectfully submitted,**

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**Attorneys for the Accused**

**CERTIFICATE OF SERVICE**

This is to certify that on December 23, 2024, that a true and correct copy of the above and foregoing document was served on Collin County District Attorney's Office, via the Texas Electronic Filing System.

*/s/ James T. Chiles*

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

James Chiles on behalf of James Chiles  
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Envelope ID: 95613367  
Filing Code Description: Request  
Filing Description:  
Status as of 12/26/2024 8:12 AM CST

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