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ATTORNEYS FOR Defendant, WALTER WESTLEY WELLS

FILED
MAY 23 2016
CLERK OF THE SUPERIOR COURT
STANISLAUS COUNTY
BY *[Signature]*

SUPERIOR COURT OF CALIFORNIA, COUNTY OF STANISLAUS

MODESTO COURTHOUSE

11	PEOPLE OF THE STATE OF CALIFORNIA,)	No. 1490969
12)	
13	Plaintiff,)	REQUEST FOR
14)	PRODUCTION OF
15	vs.)	FOUNDATIONAL
16	FRANK CARSON, <i>et al.</i> ,)	MATERIAL RE:
17)	JIM COOK
	Defendants.)	(Evidence Code §§403,
)	768, 801, 802, 804)

18 **TO: THE STANISLAUS COUNTY DISTRICT ATTORNEY**

19 Defendant, WALTER WELLS, by and through his attorneys of record, **Rien,**
20 **Adams & Cox, LLP**, hereby respectfully requests that you produce for defense inspection
21 and/or copying all materials related to and/or utilized by Mr. Jim Cook in the preparation
22 of his report(s), visual presentation(s), opinion and testimony, including but not limited
23 to, correspondence, emails, notes and discovery; and that such material be made available
24 to the defense in advance of the presentation of his testimony.

24 Dated: May 23 2016.

Respectfully Submitted,
RIEN, ADAMS & COX, LLP
[Signature]
TIMOTHY B. RIEN
Attorneys for Defendant
WALTER WELLS