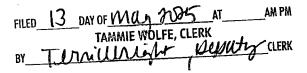
IN THE CIRCUIT COURT OF HARDIN COUNTY AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS PETITIONER]	1
VS.]] NO. 17-CF	R-10-PC
STATE OF TENNESSEE]	1 41

MOTION TO RELEASE DR. KATIE SPIRKO FROM STATE'S WITNESS LIST OR ALTERNATIVELY COMPEL THE STATE TO CALL HER AS A WITNESS IF SEQUESTERED

Comes now the Petitioner, by and through Counsel, and requests the Court to release Dr. Spirko from the State's witness list or alternatively to compel the State to call her if sequestered. For cause, the Petitioner would show unto the Court:

- Dr. Spirko worked from the beginning of the case as an agent of Petitioner's
 Counsel. She then became an agent of the Petitioner and his family and has remained so throughout.
- 2. Dr. Spirko's expertise in neuro-psychology was initially anticipated to serve as the foundation of possibly being a testifying expert in this case. However, based on a variety of circumstances, it was determined that she would not be a testifying expert for the Petitioner. Accordingly, the Petitioner has never anticipated calling either a factual or expert witness.
- 3. The State advised in March of 2025 that they were not calling her as a witness.
- 4. The State initially filed a lengthy list of "potential witnesses" that listed over 600 names of potential witnesses. Dr. Spirko's name was not listed.



5. The Court asked for a more realistic list of witnesses and the State provided one that included Dr. Spirko.

6. It is highly doubted that the State truly wishes to invite Dr. Spirko to the witness stand in this case, thus opening her for cross-examination by the Petitioner on any relevant matters that could include certifying her as an expert in her field and as applied in this case. Thus, it is suspected the State mainly wants her to be sequestered to limit her knowledge of the case being provided to Petitioner during the trial's

7. Further, it is anticipated that this is an effort to limit any further dissemination by Dr.

Spirko through her media outlets. While Petitioner's Counsel takes no position on the value and virtue of any publicity on this bench trial, the State should request a protective order instead of abusing the rule of sequestration.

breaks.

8. Thus, the Petitioner would request the State as officers of the Court to state that they are in fact calling Dr. Spirko as a witness and the Court to compel them to stick to this approach or alternatively, release Dr. Spirko from the rule of sequestration as she is not going to be a witness in this case.

RESPECTELL I V SLIBMITTED.

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NOTICE: I WILL PRESENT THIS MOTION ON MAY 19TH, 2025, AT 9:00 A.M. IN THE HARDIN COUNTY CHANCERY COURT IN SAVANNAH, TENNESSEE.

CERTIFICATE OF SERVICE

The undersigned certifies that he has sent a true and correct copy of the following Tennessee Rules of Civil Procedure, Rules	g to the person(s) listed b	elow in compliance with the
Amy Weirich: apweirich@tndagc.org		
Christopher Boiano: cvboiano@tndagc.org		
□U.S.P.S., first-class postage pre-paid □ Via Fax ☑ Via Email		Ψ
☐ Hand-delivery by: ☐ Certified Mail, Return Receipt Requested		
	DOTO	(SA-
	DOUGLAS THOMPS	ON BATES, IV