

**IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE**

**ZACHARY RYE ADAMS
PETITIONER,**

vs.

**STATE OF TENNESSEE
RESPONDENT.**

No. 17-CR-10-PC

**STATE'S RESPONSE TO PETITIONER'S MOTION TO DETERMINE
VALIDITY OF STATE'S DISCOVERY RULE 16 OBLIGATIONS**

Comes now the State of Tennessee through the undersigned attorneys and in response to the above-captioned motion submits the following:

1. The State is fully aware of its obligations under Rule 16, Rule 28 and the Post-Conviction Procedure Act.
2. Petitioner alleges that said statutes and rules require the State to "provide the Petitioner with all documents that was not in Jennifer Thompson or Jim Simmons file that the State has reviewed."
3. What Petitioner requests is beyond the mandates of Tennessee law.
4. The State of Tennessee submits that what is required by Tennessee law is the following as set forth in *Frazier v. State*, 303 S.W.3d 674 (Tenn. 2010):

FILED 21 DAY OF March, 2025 AT 7:15 AM PM
BY Tammie Wolfe TAMMIE WOLFE, CLERK
CLERK

- a. Those items deemed discoverable under Rule 16 if relevant to the issues raised in the post-conviction petition.
 - b. And any other disclosures required by state or federal constitutions.
5. Though not required, the State (as Petitioner's attorneys set forth in their motion) invited counsel to view the *entire investigative and trial materials* housed at the offices of DA Ray Whitley in Sumner County.

Per Petitioner's filing, they have not accepted said offer.
6. Our duties under Rule 16 are ongoing.

Respectfully Submitted:

/s/ Amy P. Weirich /

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been emailed to Douglas Bates IV and Crystal M. Etue, attorneys for Petitioner Adams, on this 20th day of March, 2025.

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/s/ Amy P. Weirich /

Amy P. Weirich

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been emailed to Douglas Bates IV and Crystal Etue, attorneys for Petitioner, on this the ____ day of March 2025.

Amy P. Weirich