

STATE OF WISCONSIN : CIRCUIT COURT : MARINETTE COUNTY

STATE OF WISCONSIN,

Plaintiff,

vs.

Case No. 02-CF-78

ISAAC DETTMAN,

Defendant.

**NOTICE OF MOTION AND MOTION TO DISCLOSE AMENDMENTS TO
STATEMENTS**

NOTICE IS HEREBY GIVEN that the defendant, Isaac Dettman, by his attorneys The Shellow Group, subject to jurisdictional objections, moves this court for an order requiring the prosecution to disclose to the defense any amendments or changes made to the statements of any state's witness, whether written, or otherwise recorded. This includes prior statements made to any state agent.

The defendant seeks by this motion any amendments or changes made by the state's witnesses to their prior statements, whether recorded or not. In other words, we request the disclosure of "surprise testimony". This request is made pursuant to sec. 971.23 and 971.24, Wis. Stat. and Article 1, sections one and seven of the Wisconsin Constitution and the Fifth, Sixth and Fourteenth Amendments to the United States Constitution.

For the above reasons, the defendant requests all amendments or changes made orally, in writing or otherwise, to statements made by the state's witnesses.

Dated at Milwaukee, Wisconsin this ____ day of November, 2002.

Respectfully submitted,

THE SHELLOW GROUP

Robin Shellow, State Bar No. 1005062
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