

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF GEORGIA**  
**AUGUSTA DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>CR 117-34</b>
	)	
<b>REALITY LEIGH WINNER,</b>	)	
	)	
<b>Defendant.</b>	)	

**GOVERNMENT’S MOTION FOR RECIPROCAL DISCOVERY**

COMES NOW the United States of America, by and through Bobby L. Christine, United States Attorney for the Southern District of Georgia, and files its motion to require Defendant Reality Leigh Winner (“Defendant”) to produce and disclose the following documents and evidence related to the above-captioned case. Said motion is being filed by the Government pursuant to Fed. R. Crim. P. 16(b)(1), after compliance by the Government and disclosure of information under Fed. R. Crim. P. 16(a)(1)(E) and (F).

1. **Documents and Objects.** Books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody or control of Defendant and which Defendant intends to introduce as evidence in her case-in-chief at trial. See Fed. R. Crim. P. 16(b)(1)(A).

2. **Reports of Examinations and Tests.** Results or reports of physical or mental examinations and of scientific tests or experiments made in connection with

this particular case, or copies thereof within the possession or control of Defendant which Defendant intends to introduce as evidence-in-chief at the trial or which were prepared by a witness whom Defendant intends to call at trial when the results or reports relate to their testimony. See Fed. R. Crim. P. 16(b)(1)(B).

WHEREFORE, the Government prays that Defendant Reality Leigh Winner be required to produce all documents and evidence referred to above.

This 6th day of December, 2017.

Respectfully submitted,

BOBBY L. CHRISTINE  
UNITED STATES ATTORNEY

*//s// Jennifer G. Solari*

Jennifer G. Solari  
Assistant United States Attorney

*//s// David C. Aaron*

David C. Aaron  
Trial Attorney  
U. S. Department of Justice  
National Security Division

*//s// Julie Edelstein*

Julie Edelstein  
Trial Attorney  
U. S. Department of Justice  
National Security Division

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing (“NEF”) which was generated as a result of electronic filing in this Court.

Submitted this 6th day of December, 2017.

BOBBY L. CHRISTINE  
UNITED STATES ATTORNEY

*//s// Jennifer G. Solari*

Jennifer G. Solari  
Assistant United States Attorney

Post Office Box 8970  
Savannah, Georgia 31412  
Telephone: (912) 201-2561  
Facsimile: (912) 652-4388  
E-mail: jennifer.solari@usdoj.gov