

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

UNITED STATES OF AMERICA,

v.

REALITY LEIGH WINNER,

Defendant.

CASE No. 1:17-CR-34-JRH-BKE

**MOTION FOR EXCULPATORY EVIDENCE
(Motion for Release of Brady Materials)**

COMES NOW Defendant **Reality Leigh Winner**, by and through her counsel, and moves this Honorable Court pursuant to Local Rule 7 of the Local Rules for the United States District Court for the Southern District of Georgia and Rule 16 of the Federal Rules of Criminal Procedure, for an order requiring the Plaintiff to provide the Defendant with the following:

1. Any and all information and material known to the government which may be favorable to the Defendant on the issues of guilt or punishment within the scope of *Brady v. Maryland*, 373 U.S. 83 (1963).

WHEREFORE, Defendant prays that this Motion be granted.

Respectfully submitted this 7th day of June, 2017.

TITUS T. NICHOLS

John C. Bell, Jr.

BELL & BRIGHAM

457 Greene Street

Augusta, GA 30901

706-722-2014 / Fax: 706-722-7552

Titus@BellBrigham.com

John@BellBrigham.com

/s/Titus T. Nichols

Georgia Bar No. 870662

/s/John C. Bell, Jr.

Georgia Bar No. 048600

COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the date entered above I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all interested persons.

/s/Titus T. Nichols

/s/ John C. Bell, Jr.

Counsel for Defendant
