

**STATE OF MICHIGAN  
IN THE OAKLAND COUNTY CIRCUIT COURT**

**PEOPLE OF THE STATE OF MICHIGAN,**

Plaintiff,

VS

**SANDRA MAXINE LAYNE,**

Defendant.

OAKLAND  
COUNTY

12-241986-FC



JUDGE D. LANGFORD MORRIS

PEOPLE v LAYNE, SANDRA

**JESSICA R. COOPER (P23242)**

Prosecuting Attorney

Oakland County Prosecutor's Office

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**JEROME SABBOTA (P25892)**

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**DEFENDANT'S DEMAND FOR DISCOVERY  
PURSUANT TO MICHIGAN COURT RULE 6.201**

NOW COMES the Defendant herein, SANDRA MAXINE LAYNE, by and through her attorneys, RIBITWER & SABBOTA, LLP, in addition to disclosures required by provisions of law other than MCLA §767.94a, pursuant to Michigan Court Rule 6.201, *et. seq.*, demands that the prosecuting attorney furnish the following material and information:

1. The names and addresses of all lay and expert witness whom the prosecutor may call at trial or; in the alternative, the prosecution may provide the name of the witness and make that witness available to Defendant for an interview;
2. Any written or recorded statement pertaining to the case by a lay witness whom the prosecutor may call at trial;
3. The *curriculum vitae* of an expert the prosecutor may call at trial and either a report prepared by the expert or a written description of the substance of the proposed testimony of the expert, the expert's opinion, and the underlying basis of that opinion;

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4. Any criminal record that the prosecutor may use at trial to impeach a witness;
5. A description or a list of criminal convictions known to the prosecuting attorney of any witness whom the prosecutor may call at trial;
6. A description of and an opportunity to inspect any tangible, physical evidence that the party may introduce at trial, including any document, photograph, or other paper with copies provided to defendant;
7. Any exculpatory information or evidence known to the prosecuting attorney;
8. Any police report or the interrogation records concerning the case;
9. Any written or recorded statements by a defendant, co-defendant or accomplice pertaining to the case;
10. Any affidavit, warrant, and return pertaining to a search or seizure in connection with the case; and
11. Any plea agreement, grant of immunity, or other agreement for testimony in connection with the case.

Please note that Michigan Court Rule 6.201(F) mandates that the prosecuting attorney must comply with the requirements of this rule within twenty-one (21) days of the request. Michigan Court Rule 6.201(I) indicates that if a party fails to comply with this rule, the court may prohibit the party from introducing in evidence the material not disclosed or enter such order as it deems just under the circumstances.

Respectfully submitted,

RIBITWER & SABBOTA, LLP

JEROME SABBOTA (P25892)

Attorney for Defendant

DATED: July 3, 2012

#### CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on 7/3/12.

By: ☒ Overnight Courier ☐ FAX ☐ E mailed  
☐ Hand Delivered ☐ U.S. Mail ☐ Other  
☐ Certified Mail ☐ Scanned

Signature [Signature]

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