

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS

IN COUNTY COURT NO. ONE

VS.

\_\_\_\_\_  
GALVESTON COUNTY, TEXAS

**AGREED DISCOVERY ORDER**  
**CRIMINAL CASES**

On this day the above styled cause was called for pretrial hearing. The defendant, defendant's attorney and the Assistant District attorney representing the State appeared. The Court hereby orders that the State produce and permit the inspection of, or the copying and/or photographing of the following items:

1. All statements by the Defendant pursuant to the Texas Code of Criminal Procedure Article 38.22 and all written statements made by the Defendant in connection with this offense with which the Defendant is herein charged.
2. All objects and tangible property taken by the State during the course of its investigation of the offense with which the Defendant is herein charged, and any items which may be introduced at trial.
3. Any written waivers or consent forms signed by the Defendant.
4. The prior criminal record of the Defendant.
5. All final adult felony convictions and misdemeanors of moral turpitude on the part of all witnesses called by the State subsequent to their testifying for the State.
6. A list of all extraneous offenses by the Defendant which the State intends to introduce at trial.
7. Any exculpatory and/or mitigating evidence within the possession, custody, or control of the State, the existence of which is known, or by the exercise of due diligence, may become known to the State.
8. Any photographic line-ups shown in the course of the investigation of this case.
9. The final results of any laboratory test or any other analytical test pertaining to evidence in this case.

10. **Inspection of any prior convictions of the Defendant, which may be used for impeachment or enhancement purposes.**
11. **All photographs taken, or used, in the course of the investigation of this case.**
12. **Prior to voir dire, a list of all the names of prospective prosecution witnesses who have knowledge and likely will be used at the guilt/innocent phase and the punishment phase of the trial, with a continuing duty on the part of the State to disclose the names of rebuttal witnesses as soon as they become known.**
13. **All written statements by any party or witness to this alleged offense, which might in any manner, be material to either the guilt or innocence of the Defendant or the punishment, subsequent to the witness testifying.**
14. **All handwritten and typed reports prepared by peace officers that investigated and participated in any manner in the preparation of these charges against the Defendant, subsequent to the witness testifying.**
15. **Details of any plea agreements in relation to any Co-Defendant, accomplice, or informant.**
16. **The Court further orders the Defendant's attorney to provide in writing to the State at its offices at 722 Moody, Galveston Texas, the name and address of each expert witness the Defense may use at trial to present evidence under Rules, 702,703, and 705 of the Texas Rules of Criminal Evidence.**
17. \_\_\_\_\_  
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**The State and the Defense are under a continuing duty to supplement discovery with any of the above items that comes to its attention. Discovery is to be completed on or before two days prior to the pre-trial conference unless otherwise stated above.**

**SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2005.**

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**Attorney for the State**

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**Attorney for the Defense**

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**JOHN GRADY**  
**Presiding Judge**