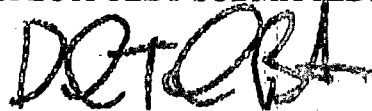


FILED 13 DAY OF May 2005 AT _____ AM PM
TAMMIE WOLFE, CLERK
BY Terrill Wright Deputy CLERK

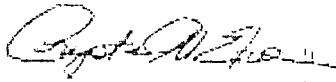
5. The Court asked for a more realistic list of witnesses and the State provided one that included Dr. Spirko.
6. It is highly doubted that the State truly wishes to invite Dr. Spirko to the witness stand in this case, thus opening her for cross-examination by the Petitioner on any relevant matters that could include certifying her as an expert in her field and as applied in this case. Thus, it is suspected the State mainly wants her to be sequestered to limit her knowledge of the case being provided to Petitioner during the trial's breaks.
7. Further, it is anticipated that this is an effort to limit any further dissemination by Dr. Spirko through her media outlets. While Petitioner's Counsel takes no position on the value and virtue of any publicity on this bench trial, the State should request a protective order instead of abusing the rule of sequestration.
8. Thus, the Petitioner would request the State as officers of the Court to state that they are in fact calling Dr. Spirko as a witness and the Court to compel them to stick to this approach or alternatively, release Dr. Spirko from the rule of sequestration as she is not going to be a witness in this case.

RESPECTFULLY SUBMITTED:



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**NOTICE: I WILL PRESENT THIS MOTION ON MAY 19TH, 2025, AT 9:00 A.M. IN
THE HARDIN COUNTY CHANCERY COURT IN SAVANNAH, TENNESSEE.**

CERTIFICATE OF SERVICE

The undersigned certifies that he has on the _____ day of _____ 2025,
sent a true and correct copy of the following to the person(s) listed below in compliance with the
Tennessee Rules of Civil Procedure, Rules 5 and/or 5A, by the following indicated method(s):

Amy Weirich: apweirich@tndagc.org

Christopher Boiano: cvboiano@tndagc.org

- ☐ U.S.P.S., first-class postage pre-paid
- ☐ Via Fax
- ☒ Via Email
- ☐ Hand-delivery by:
- ☐ Certified Mail, Return Receipt Requested



DOUGLAS THOMPSON BATES, IV