

IN THE CIRCUIT COURT  
OF THE FIFTH JUDICIAL CIRCUIT  
EDGAR COUNTY, ILLINOIS

**FILED**

OCT 18 2016

*Sandra K. Willett*  
Circuit Clerk, 5th Judicial Circuit Edgar County

THE PEOPLE OF THE STATE OF  
ILLINOIS,

Plaintiff,

vs.

STACEY C. HAWKINS,

Defendant.

Nos. 2016-CM-205

MOTION FOR DISCOVERY

NOW COMES Stacey C. Hawkins, Defendant, by Lou J. Viverito of Taylor Law Offices, P.C., and pursuant to the opinion of the Supreme Court of Illinois in People v. Schmidt, 56 Ill.2d 572 (1974), Stacey C. Hawkins, Defendant, hereby requests disclosure of the following material and information:

(i) the names and last known addresses of persons whom the State intends to call as witnesses, together with their relevant written or recorded statements, memoranda containing substantially verbatim reports of their oral statements, and a list of memoranda reporting or summarizing their oral statements;

(ii) any written or recorded statements and the substance of any oral statements made by Stacey C. Hawkins, Defendant, and a list of witnesses to the making and acknowledgment of such statements;

(iii) any factors which tend to negate the guilt of Stacey C. Hawkins, Defendant, as to each offense charged or would tend to reduce her punishment therefor; and

(iv) any books, papers, documents, photographs, audio recordings, video recordings, or tangible objects which the prosecuting attorney intends to use in the hearing or trial or which were obtained from, or relate or belong to, Stacey C. Hawkins, Defendant.

Respectfully submitted,

Stacey C. Hawkins, Defendant,

By: 

Lou J. Viverito of  
Taylor Law Offices, P.C.

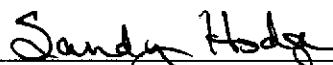
Lou J. Viverito of  
TAYLOR LAW OFFICES, P.C.  
122 East Washington Avenue  
P.O. Box 668  
Effingham, Illinois 62401  
(217) 342-3925

PROOF OF SERVICE

Sandy Hodge, Legal Assistant to Lou J. Viverito, counsel for Stacey C. Hawkins, Defendant, hereby certifies that she has served a copy of the foregoing Motion For Discovery upon:

The People of the State of Illinois  
c/o Mark R. Isaf  
Edgar County State's Attorney  
115 W. Court St.  
Paris, IL 61944

by mailing a true copy thereof in an envelope duly addressed to Mark R. Isaf, bearing proper first class postage and deposited in the United States mail at Effingham, Illinois, this 17<sup>th</sup> day of October, 2016.

  
Sandy Hodge