

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

JUANE T. KENNEL,

Petitioner,

v.

DAVE DORMIRE,

Defendant.

Case No. 4:09-CV-407 AGF

**PETITIONER'S MOTION FOR A COURT ORDER TO COMPEL THE
PRODUCTION OF FILES AND DOCUMENTS**

COMES NOW petitioner, Juane Kennell, by and through counsel, and moves this Court for a court order compelling the St. Louis City Circuit Clerk's Office, the St. Louis City Circuit Attorney's Office, the St. Louis City Public Defender's Office, and the St. Louis City Police Department to provide copies of various files and documents in their possession in order to enforce and comply with this Court's order of October 5, 2010, granting petitioner's motion to authorize discovery. In support of this motion, petitioner states as follows:

1. On April 22, 2010, petitioner filed a motion to authorize discovery, requesting files and documents in the possession of the St. Louis City Circuit Clerk's Office, the St. Louis City Circuit Attorney's Office, the St. Louis City Public Defender's Office, and the St. Louis City Police Department regarding

E-FILED

A-178

arrests and charges brought against Jeffrey Shockley and Robert Stewart. This Court granted petitioner's motion to authorize discovery on October 5, 2010.

2. As noted in prior motions and pleadings, this request for discovery was necessary because the agencies noted above, will not turn over these files and documents to petitioner's counsel without a court order. Thus, in order to comply with this Court's discovery order, petitioner seeks court orders directing the four agencies set forth above to produce and provide copies of files and documents requested in the underlying discovery motion to counsel for petitioner within thirty (30) days. Proposed orders directing these four agencies to produce their files and documents are attached hereto.

Respectfully submitted,

/s/ Kent E. Gipson

Kent E. Gipson, #34524
Law Office of Kent Gipson, LLC
121 East Gregory Boulevard
Kansas City, Missouri 64114
816-363-4400 • Fax: 816-363-4300
kent.gipson@kentgipsonlaw.com
ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of October, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Kent E. Gipson

Kent E. Gipson

JUANE T. KENNEL,

Y.

DAVE DORMIRE.

ORDER

You are hereby commanded to produce and provide copies of the following documents and files to counsel for petitioner, Kent E. Gipson, 121 East Gregory Boulevard, Kansas City, Missouri 64114, Phone 816-363-4400, within thirty (30) days of this order:

1. The entire criminal case court file in *State v. Jeffrey Shockley*, No. 021-00715.
2. Any other criminal case files involving any charges filed against *Jeffrey Maurice Shockley*, B/M, D.O.B. 07-24-84, that were filed during the calendar years of 2002, 2003, and 2004.
3. Any criminal case files involving any charges filed against *Robert Dennis Stewart*, B/M, D.O.B. 07-15-83, that were filed during the calendar years of 2002, 2003, and 2004.

A-180

IT IS SO ORDERED.

**AUDREY G. FLEISSIG,
UNITED STATES DISTRICT JUDGE**

Dated this ____ day of October, 2010.

2
A-181