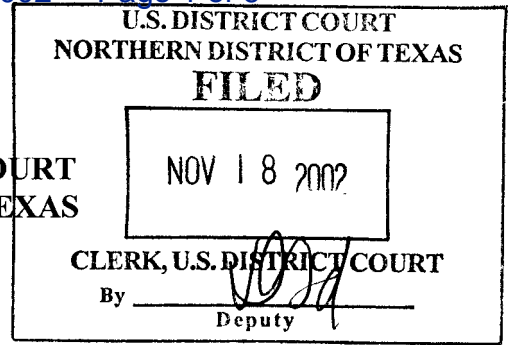


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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



GREGORY EDWARD WRIGHT

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v.

3:01CV-0472-M(BF)

STATE OF TEXAS

AMENDED MOTION TO DISCLOSE INFORMATION AND MEMORANDUM

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the plaintiff, GREGORY EDWARD WRIGHT, in the above styled and numbered cause, by and through his attorney of record, and moves this Honorable court to order the State Attorney General and/or his assistants to disclose the following information:

1. All jeans seized from the Beckley shack, Gregory Wright or John Wade Adams whether submitted for testing or not. The evidence strongly indicates that the person who wore the jeans was the primary, if not sole killer. As set out in Petitioner's Claims VIII and XIII, the jeans were worn by Mr. Adams. The jean size is critical to this determination, therefore, the Petitioner seeks the production of these jeans for examination.
2. Photographs of the original book-in of John Wade Adams and Gregory Edward Wright. The State claims Petitioner is guilty because he sustained wounds from the stabbing which bled and thus link him to the crime scene. Petitioner denies these allegations. The trial evidence refers to these pictures of the Petitioner and co-defendant Adams and the clothes they were arrested in as proof of Petitioner's

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wounds. To that extent the photographs are, or should be part of the record and are relevant. See Claim XII.

3. Original videotape of the interrogation of John Wade Adams. The State claims Petitioner is guilty because he sustained wounds from the stabbing which bled and thus link him to the crime scene. Petitioner denies these allegations. The trial evidence refers to these pictures of the Petitioner and co-defendant Adams and the clothes they were arrested in as proof of Petitioner's wounds. To that extent the photographs are, or should be part of the record and are relevant. See Claim XII.
4. Clothes worn by John Wade Adams at the original book-in. The State claims Petitioner is guilty because he sustained wounds from the stabbing which bled and thus link him to the crime scene. Petitioner denies these allegations. The trial evidence refers to these pictures of the Petitioner and co-defendant Adams and the clothes they were arrested in as proof of Petitioner's wounds. To that extent the photographs are, or should be part of the record and are relevant. See Claim XII.
5. Clothes worn by Gregory Edward Wright at the original book-in. The State claims Petitioner is guilty because he sustained wounds from the stabbing which bled and thus link him to the crime scene. Petitioner denies these allegations. The trial evidence refers to these pictures of the Petitioner and co-defendant Adams and the clothes they were arrested in as proof of Petitioner's wounds. To that extent the photographs are, or should be part of the record and are relevant. See Claim XII.

6. Inventory of all items found at the Vick home. Petitioner claims that clothes belonging to him were seized from the decedent's home. These clothes reflect his true sizes in contrast to the Umen jeans. See claims VIII and XIII. Therefore, the clothes taken from the residence are probative of Petitioner's innocence.
7. Inventory of items found in the Beckley shack. Petitioner contends that the shack was equally the domain of co-defendant Adams, in stark contrast to the position of the State at trial. An inventory of the items seized from the shack will establish the factual basis for Petitioner's claims by showing Adams' control of the shack.
8. All documents in the possession of the State relating to any purported offer or deal to witness Moseley in Gregory Edward Wright's file or John Wade Adams' file. The deal with Moseley is the basis for claims I and II.. The State denies any deal, and the State's prosecution file with any contemporaneous notes would be the best existing evidence of any offer made to Moseley.
9. All documents in the possession of the State relating to witness Moseley in John Wade Adams' file. The deal with Moseley is the basis for claims I and II.. The State denies any deal, and the State's prosecution file with any contemporaneous notes would be the best existing evidence of any offer made to Moseley.
10. All documents relating to witness McGaughey's location in Gregory Edward Wright's file. Witness McGaughey is the basis of Claim IV V and XIII. The State claims not to have known McGaughey's whereabouts at the time of trial. The prosecution file will contain dispositive evidence of the State's contact with McGaughey.

11. All documents relating to McGaughey's location in John Wade Adams' file. Witness McGaughey is the basis of Claim IV V and XIII. The State claims not to have known McGaughey's whereabouts at the time of trial. The prosecution file will contain dispositive evidence of the State's contact with McGaughey.
12. Expert James Cron's file on the Gregory Wright case. Claim XIV concerns the "bloody fingerprint" tying Wright to the crime scene. The quality of the print is the key issue in determining its probative value. The original must be produced in order to ascertain that quality.
13. Fingerprint on the pillowcase. Claim XIV concerns the "bloody fingerprint" tying Wright to the crime scene. The quality of the print is the key issue in determining its probative value. The original must be produced in order to ascertain that quality.
14. The 911 tapes and any notes/documents relating to them - Dallas Service numbers 251842-F and 251908-F. Much was made at trial of Adams' "confession" on the 911 call. Either the call implicated Adams directly or it did not. The tape is the best evidence and the Petitioner asserts that the 911 tape contradicts the State's contention that Adams did not confess to the murder.
15. Documents regarding Jerry Causey in Gregory Edward Wright's file. Witness Causey is the basis of Claims III and XIII. The State claims not to have known Causey's whereabouts at the time of trial.. The prosecution file will contain dispositive evidence of the State's contact with Causey

16. Documents regarding Jerry Causey in John Wade Adams' file. Witness Causey is the basis of Claims III and XIII. The State claims not to have known Causey's whereabouts at the time of trial. The prosecution file will contain dispositive evidence of the State's contact with Causey.

Respectfully submitted,



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ATTORNEY FOR GREGORY WRIGHT

CERTIFICATE OF CONFERENCE

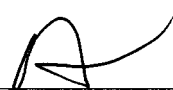
Pursuant to local rules 5.1(a) and (c), a conference was held pertaining to the foregoing motion with State's attorney Denis S. Garcia on November 15, 2002, and she indicated that she is opposed not opposed to this motion.



BRUCE ANTON

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed to Deni S. Garcia, Assistant Attorney General, Capital Litigation Division, P.O. Box 12548, Austin, TX 78711-2548, on the 15 day of November 2002.



BRUCE ANTON