

IN THE CIRCUIT COURT OF CLAY COUNTY, ARKANSAS  
WESTERN DISTRICT  
CRIMINAL DIVISION

94 JAN 7 P 4 :26

STATE OF ARKANSAS

PLAINTIFF

VS.

NO. CR-93-47

JESSIE LLOYD MISSKELLEY, JR.

DEFENDANT

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DEFENDANT'S AMENDED RESPONSE TO  
STATE'S MOTION FOR DISCOVERY

COMES now the Defendant, Jessie Lloyd Misskelley, Jr.,  
by and through his Court appointed attorneys, Stidham and  
Crow, and for his response to the State's Motion for Pre-  
trial Discovery, states:

1. The Defendant denies the State is entitled to  
information sought in its Motion unless specifically admitted  
herein.

2. At the present time, there is one report or  
statement from an expert that the State does not already  
possess. A copy of the report of Warren D. Holmes is  
attached hereto.

3. At a trial of this cause, the Defendant will rely  
on the following defenses:

a. Requiring the State to prove all the elements of the  
charges beyond a reasonable doubt; and

b. alibi

4. At the present time, those witnesses known by the  
Defendant who may testify in the trial of this cause are

attached hereto. Defendant reserves the right to call as witnesses persons named by the State as potential witnesses.

5. At the present time, those exhibits known by the Defendant which may be introduced in the trial of this cause are attached hereto. Defendant reserves the right to introduce as exhibits, those exhibits listed by the State as potential exhibits.

WHEREFORE, the Defendant denies that the Prosecuting Attorney is entitled to discover those items not admitted hereinabove and prays to that extent the Motion be denied.

STIDHAM AND CROW  
ATTORNEYS AT LAW

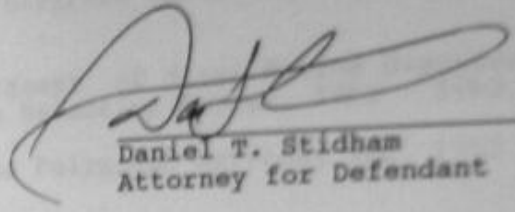
By: 

Daniel T. Stidham  
Bar No.: 88051  
203 N. Second Street  
Paragould, AR 72450  
(501) 236-7600

CERTIFICATE OF SERVICE

I, Daniel T. Stidham, Attorney for Defendant herein, do hereby certify that I have served a copy of the foregoing document on John N. Fogleman, Deputy for Crittenden County, Arkansas, 108 Dover Road, P.O. Box 1666, West Memphis, Arkansas 72303 by placing same in the U.S. Mail on this

7<sup>th</sup> day of January, 1994, with sufficient postage attached to ensure delivery.

  
Daniel T. Stidham  
Attorney for Defendant

1. President of Federal Polygraph Association - Chicago Illinois.
2. Former Detective Sergeant in charge of the FBI Chicago office.
3. Self-employed, Chicago, Illinois.
4. Charter and Life Member of the Florida and American Polygraph Associations.
5. Former President of the Florida Polygraph Association and former President of the American Polygraph Association. Investigative professional work of the American Polygraph Association.
6. Author of numerous articles on lie detection and interrogation for various professional journals.
7. Each year since 1977, Mr. Stidham conducts seminars on lie detection and interrogation for various police agencies throughout the U.S.
8. For ten years, Mr. Stidham was guest lecturer on interrogation of homicide suspects at the Royal Canadian Mounted Police Academy in Ottawa, Canada.
9. Mr. Stidham lectures each year at the FBI Academy and other federal agencies on lie detection and interrogation.
10. Former Special Consultant to the U.S. Senate Select Committee on Assassinations, Washington, D.C.
11. Mr. Stidham has administered polygraph examinations in the following national cases:
  1. John F. Kennedy Assassination
  2. Dr. Martin Luther King Assassination
  3. Watergate
  4. William Kennedy-Delish Case