# IN THE CIRCUIT COURT OF MINGO COUNTY, WEST VIRGINIA

| [John Doe],  Juvenile Respondent, | Juvenile Case No.: |
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| a child under the age of 18 years | Judge Thompson |
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CHILD’S INITIAL MOTION FOR DISCOVERY

The child, [John Doe], by counsel, \_\_\_\_\_\_\_\_\_\_\_\_\_, respectfully moves this Honorable Court to order the State of West Virginia through its Prosecuting Attorney to provide the following by way of initial disclosure, pursuant to West Virginia Rules of Juvenile Procedure Rule 21 (a):

1. Evidence obtained against the juvenile as a result of any search, seizure or electronic forms of recording, voice, pictures or both;
2. Statements made by the juvenile including the names of individuals present at the time of the statement and the relationship, if any, to the juvenile; and
3. Evidence acquired or discovered as a result of the statements referenced in subparagraph (b).
4. A narrative of identification procedures, if any, involving the child, including live or photo line-up.

|  | Respectfully submitted, |
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| Teresa McCune, Chief Public Defender  State Bar No. 2428  P.O. Box 310  Williamson, WV 25661 | [John Doe]  By Counsel |