

NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

NOTICE Electronically Filed:
November 30, 2015 16:56

By: LYNN MARO 0052146

Confirmation Nbr. 606885

THE STATE OF OHIO

vs.

JOHN MCNALLY

CR 14 585428-A

Judge:

JANET R. BURNSIDE

Pages Filed: 9

**In the Court of Common Pleas
Cuyahoga County, Ohio**

STATE OF OHIO,

Plaintiff

vs.

JOHN A. McNALLY, IV
MICHAEL V. SCIORTINO,

Defendant

} Case No CR-14-585428-A&B

} Hon. Janet R. Burnside

DEFENDANTS McNALLY & SCIORTINO JOINT
NOTICE OF FURNISHING RECIPROCAL DISCOVERY

COME NOW THE DEFENDANTS, JOHN A. McNALLY, IV and MICHAEL V. SCIORTINO, through counsel, and furnished discovery as follows:

(1) Laboratory or hospital reports, books, papers, documents, photographs, tangible objects, buildings or places:

➤ See documents Bates stamped 000001-002853, on a compact disc mailed this day to State's lead counsel;

➤ Additional items may be supplied as the Defendants gain access to them as they complete review of the State's discovery, complete their own investigation, and obtain items through public records requests and/or the issuance of trial subpoenæ. This response is subject to the standard of due diligence and the continuing duty to supplement disclosures described in OHIO CRIM.R. 16(A).

(2) Results of physical or mental examinations, experiments or scientific tests:

➤ None at this time, except as may have been furnished by State in Discovery. This response is subject to the standard of due diligence and the continuing duty to supplement disclosures described in OHIO CRIM.R. 16(A).

(3) Any evidence that tends to negate the guilt of the defendant, or is material to punishment, or tends to support an alibi:

➤ Testimony of defense witnesses; testimony of State's witnesses identified in both lists, documents supplied by the State in discovery; documents to be accessed through compulsory process and through public records requests all tend to negate guilt of Defendants. No evidence of alibi. This response is subject to the standard of due diligence and the continuing duty to supplement disclosures described in OHIO CRIM.R. 16(A).

(4) All investigative reports, except as provided in OHIO CRIM.R. 16(J):

➤ None at this time, except as furnished by State in discovery. This response is subject to the standard of due diligence and the continuing duty to supplement disclosures described in OHIO CRIM.R. 16(A).

(5) Any written or recorded statement by a witness in the defendant's case-in-chief, or any witness that it reasonably anticipates calling as a witness in sur-rebuttal. This response is subject to the standard of due diligence and the continuing duty to supplement disclosures described in OHIO CRIM.R. 16(A).

► None, except as furnished by State in Discovery

Witness List.

<u><i>No</i></u>	<u><i>Name and last known address</i></u>
1	Linette Stratford 4407 North Warwick Drive Canfield, Ohio 44406
2	Paul Gains 7003 Harrington Avenue Youngstown, Ohio 44512
3	Tim Ryan 560 Amber Drive SE Warren, Ohio 44484
4	Lisa Babish Forbes 3130 Chadbourne Road Shaker Heights, Ohio 44120
5	Natalia Steele 35655 Niles Road Moreland, Ohio 44022
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7	Harry Strabala 2761 Mount Vernon Avenue Youngstown Ohio 44502
8	Lisa Antonini 2630 Gladwae Drive Youngstown, Ohio 44511
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Respectfully submitted,

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Counsel for Defendant
John A. McNally, IV

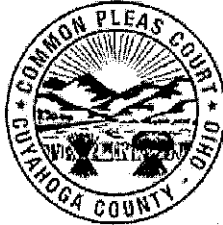
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Counsel for Defendant
Michael V. Sciortino

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was electronically filed on November 30, 2015 with the Clerk of the Court using the e-filing system, and that all counsel of record were served by electronic mail. Parties also may access this filing through the e-filing system.

/s/ John B. Juhasz
JOHN B. JUHASZ

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Respectfully submitted,

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Counsel for Defendant
Michael V. Sciortino

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/s/ John B. Juhasz
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