IN THE DISTRICT COURT OF WASHINGTON COUNTY

STATE OF OKLAHOMA

DISTRICT COURT WASHINGTON CO OK
JEAN DAVIS, COURT CLERK
FILED
APR 21 2025
BY
DEPUTY

STATE OF OKLAHOMA,
Plaintiff,

vs. **Case No. CM-2024-00301**

FLYNN ROBERT MARTIN,

Defendant (Pro Se).

DEFENDANT'S MOTION FOR IMMEDIATE DISCLOSURE OF DISCOVERY AND DISCOVERY LOG

(Defendant Appearing Pro Se)

COMES NOW Defendant, Flynn Robert Martin, appearing pro se, respectfully moving this Court pursuant to **22 O.S. § 2002(A)** for an order directing the State of Oklahoma to immediately disclose all discovery materials relevant to this case directly to Defendant, along with a detailed log indicating all prior discovery disclosures made by the State to Defendant's former counsel.

In support of this motion, Defendant states the following:

I. FACTUAL AND PROCEDURAL BACKGROUND

1. On April 9, 2025, the Court granted Defendant's request to proceed pro se, thereby discharging Defendant's appointed counsel, Ms. Kristi Sanders.

2. To date, Defendant has received no discovery materials previously provided by the State to former counsel, despite making documented requests to Ms. Sanders in writing between December 6, 2024, and the January 10, 2025 cutoff hearing.

3. Defendant has an upcoming dispositive motion hearing scheduled for May 15, 2025, and it is imperative Defendant obtains immediate access to all discovery materials in order to

adequately prepare for this proceeding and any subsequent matters.

II. APPLICABLE LEGAL AUTHORITY – 22 O.S. § 2002

Under Oklahoma law, specifically **22 O.S. § 2002(A)**, Defendant is statutorily entitled to full and timely disclosure of discovery from the prosecution, including police reports, statements of witnesses, laboratory reports, and any other documents or evidence relevant to the charges filed in this case.

Pursuant to **22 O.S. § 2002(D)**, the State has a continuing obligation to promptly disclose additional materials or evidence as they become known or available.

III. SPECIFIC RELIEF REQUESTED

Accordingly, Defendant respectfully requests the Court issue an Order directing the prosecution to immediately provide the following:

1. **All discovery materials previously disclosed to Defendant's former counsel**, including but not limited to police reports, witness statements, OSBI lab reports, video and audio recordings, correspondence, and investigative materials relevant to the charges;

2. **A detailed discovery log or index**, clearly indicating each item of discovery previously disclosed, along with specific dates of each disclosure to Defendant's former counsel;

3. **Immediate disclosure of any additional discoverable material** related to this prosecution that has not yet been disclosed to Defendant.

IV. REQUESTED ORDER

WHEREFORE, Defendant respectfully requests this Court enter an order:

1. Directing the prosecution to promptly disclose all previously provided discovery materials directly to Defendant, pursuant to 22 O.S. § 2002(A);

2. Directing the prosecution to provide Defendant a detailed discovery log indicating all prior disclosure dates;

3. Directing the prosecution to immediately produce any additional discoverable evidence currently in the State's possession that has not previously been disclosed; and

4. Granting any further relief the Court deems just and appropriate under the circumstances.

Respectfully submitted,

/s/ Flynn Robert Martin
Flynn Robert Martin
Defendant, Pro Se
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(520) 869 - 2821
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Dated: April 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2025, a true and correct copy of the foregoing **Motion for Immediate Disclosure of Discovery and Discovery Log** was mailed to the Washington County Court Clerk with a request that, upon receipt and filing, a copy be placed in the prosecutor's court mailbox at the courthouse.

Respectfully submitted,

/s/ Flynn Robert Martin
Flynn Robert Martin
Defendant, Pro Se