

[CAPTION]

**MOTION FOR PRODUCTION OF EVIDENCE: COPY OF TAPE
RECORDING AND LOGS OF ALL RADIO TRAFFIC CONCERNING
DEFENDANT**

The Defendant, by counsel, pursuant to the Indiana and U.S. Constitutions, requests this Court enter an order requiring the [INSERT POLICE DEPARTMENT] to furnish a copy of all calls, all radio traffic, and logs concerning the Defendant. In support of the Motion, the Defendant states the following:

1. The Defendant has been arrested and charged with the offense of [INSERT OFFENSE(S)].
2. The Defendant believes that dispatch recordings and logs may reveal statements of officers which may be helpful in preparing a defense; therefore, this information is necessary in order to preserve the Defendant's right to present a defense as guaranteed by the Sixth Amendment of the U.S. Constitution and Article I, Section 13 of the Indiana Constitution.
3. In the least, the recordings are relevant and not privileged.
4. The Defendant has submitted proposed orders directed to the [INSERT POLICE DEPARTMENTS].

WHEREFORE, the Defendant, by counsel, respectfully requests this Court to issue an order as requested above and for all other relief just and proper in the premises.

(Signature)