

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

V.

CAUSE NO. 3:20-cr-00031-CWR-LGI

**TED BRENT ALEXANDER and
JON DARRELL SEAWRIGHT**

**DEFENDANT JON DARRELL SEAWRIGHT 'S REQUEST FOR THE GOVERNMENT TO
DISCLOSE EXPERT WITNESS SUMMARIES AND OTHER INFORMATION**

Jon Darrell Seawright has been charged with Conspiracy to Commit Securities and Commodities Fraud, and Commit Wire Fraud, Securities and Commodities Fraud, and Wire Fraud. Pursuant to *F.R.C.P.* 16 (G), Mr. Seawright requests a written summary of any testimony that the Government intends to use under *F.R.E.* 702, 703 or 705 during its case in chief. The summaries should include the bases and reasons for the experts' opinions as well as the witness's qualifications.

As a part of this request, and in order to make use of any expert he may retain, Mr. Seawright moves pursuant to *F.R.C.P.* 16 (E), to be permitted to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, buildings or places, or copies or portions of any of these items, if the item is within the government's possession, custody, or control and:

- (i) the item is material to preparing the defense;
- (ii) the government intends to use the item in its case-in-chief at trial; or
- (iii) the item was obtained from or belongs to the defendant.

Also, under the authority of F.R.C.P. 16 (F) Mr. Seawright requests the government permit the defendant to inspect and to copy or photograph the results or reports of any scientific test or experiment if:

- (i) the item is within the government's possession, custody, or control;
- (ii) the attorney for the government knows—or through due diligence could know—that the item exists; and
- (iii) the item is material to preparing the defense or the government intends to use the item in its case-in-chief at trial.

As trial is set on January 18, 2022, Mr. Seawright requests such information to be provided within ten (10) days, November 29th, 2021, of this request in order for him to provide such information to his own experts.¹

Respectfully submitted,

BY: /s/ Charles R. Mullins
CHARLES R. MULLINS

¹The parties had submitted a proposed agreed scheduling order to the Court but the Court has not yet approved the order. That scheduling order provided for the Government to designate its expert by November 19, 2021.

PREPARED BY:

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CERTIFICATE OF SERVICE

I, Charles R. Mullins, hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all parties of interest.

This the 19th day of November 2021.

/s/ Charles R. Mullins
CHARLES R. MULLINS

