

1 The defense would expect likely more than 15 lay witnesses, plus expert witnesses from
2 both sides.

3 **Final Trial Management Conference**

4 The Court has set a final trial management conference in the month before trial.

5 **Brief Summary of Alleged Facts**

6 The victim was murdered and her body buried in a shallow grave

7 **Expert Witness Production Schedule**

8 The defense anticipate both sides will call expert witnesses. The defense anticipates
9 hiring expert witnesses once additional discovery, witness interviews and defense case
10 investigation progresses. The defense wants to make sure all necessary witnesses are
11 retained, and is cognizant of not wasting finite witness resources on unnecessary
12 witnesses. Defense' mitigation investigation is ongoing in its initial stages.

14 **Witness Interview Schedule**

15 The State and Defense have conducted interviews at the Bullhead City Police
16 Department with 22 officers and detectives who participated in the investigation of this
17 case. There are numerous other interviews remaining but excellent progress has
18 already been made. The State and Defense will confer and make arrangements to
19 continue the interview process, and anticipate numerous additional interviews will be
20 conducted prior to the next court date.

21 **List of Motions Needing Ruling**

22 The defense has filed numerous motions with the Court beginning March 9th, 2015, and
23 has filed additional motions since then. In fact, the defense has filed two additional
24 motions this date, and provided copies to the listed parties in Court. The State, through
25 the assigned Deputy County Attorneys and Counsel for the Detention Center, have filed
26 Responses on many of the previously filed motions. To date, the parties await Court
27 rulings on 12 defense motions, inclusive of the two filed today.
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2 **Schedule for Motions *In Limine***

3 The defense has already filed such motions, and anticipates filing more. Given normal
4 trial practice it is anticipated rulings on those motions will be made next year, as trial
5 approaches.

6 **Special Investigative Needs**

7 The State has indicated cooperation in regards to inspection of the area regarding the
8 discovery of the victims body; the defense will need access to inspect crime scenes,
9 and will arrange for evidence views when the defense is prepared to do so.

10 It is too early to determine the extent of motion practice needed regarding certain
11 investigation needs at the present time. The defense may file an additional motion to
12 add a case- dedicated investigator in the near future.

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14 **Mitigation Investigation Progress**

15 The Court at the last hearing indicated approval of the appointment of Rennee DeSaye
16 to assist Mr. Rector. Ms DeSaye was specifically requested by defense counsel
17 because of her excellent, efficient and comprehensive work. She and the defense team
18 have met with Mr. Rector via videophone. Ms. DeSaye will be immersed in producing
19 necessary documentation for Mr. Rector to assist with his mitigation presentation and to
20 assist with potential plea negotiations. Since the last hearing, Ms. DeSaye has made
21 significant progress in attempting to secure mitigation documentation and other
22 evidence, and has updated undersigned counsel as to her efforts to date.

23
24 **Expert Witness issues (dates for defense disclosure experts and opinions)**

25 Regarding the guilt/ innocence portion of the proceedings the State has provided a list
26 of witnesses that purport to identify certain expert witnesses. The defense investigation
27 is in its infancy and continues to investigate facts, and conduct its own separate
28 investigation, and has not yet determined what experts it may call.

1 **General Status v. Plea Negotiations**

2 Given the defense's late arrival on this case, plea negotiations have not begun in
3 earnest. Until further investigation is done, and case strengths and weaknesses are
4 flushed out, it is inappropriate for the defense to ask for anything other than outright
5 dismissal without doing its due diligence and conducting a thorough defense
6 investigation on Mr. Rector's behalf. I believe it is safe to say Plea Negotiations will
7 take place, as both sides have a duty to at least explore possible options for the best
8 interests of the parties, and the citizens of Mohave County. The parties are in the
9 process of assessing the relative strength's and weaknesses of their respective cases.

10 **Plea Cutoff Date**

11 As there is no plea requested or offered at this date, there is no current plea cutoff date.

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14 **Settlement Conference Date**

15 It is anticipated that in the future one or more settlement conferences will take place to
16 attempt to resolve this matter short of trial. It is premature at this time for most of the
17 reasons discussed above.

18 **Interpreter Needs**

19 Presently none....but could obviously change given potential witnesses being called at
20 trial. Both sides will endeavor to alert the court of any such needs so arrangements can
21 be made well in advance.

22 **Schedule of Regular Case Management Conferences**

23 The present schedule seems reasonable...with conferences every 30-45 days.

24 **Other Information**

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26 The working relationship between the parties is generally good, and both sides will
27 attempt to work together to prepare the case for trial. If issues arise the parties cannot
28 resolve after consultation, they will seek court assistance.

RESPECTFULLY SUBMITTED THIS 15th day of July, 2015.

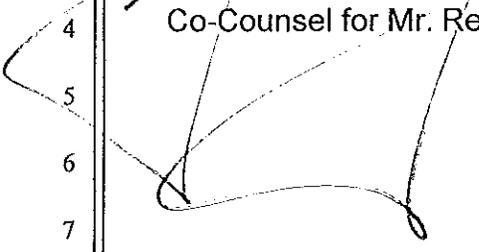
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1 ORIGINAL of the foregoing filed
2 this ___ day of July, 2015 with:

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4 401 E Spring Street
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6 COPY of the delivered
7 this ___ day of July, 2015 to:

8 Honorable Lee Jantzen
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25 File

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