

Declaration of Service

I hereby declare that I sent a copy of the document on which this declaration appears to JOLIET SCHRENGOHST with proper postage and address, via fax, mail, messenger, **electronic**.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Vancouver, Washington on 06.01.26

By Claire Bateson
Signature

IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK

CITY OF VANCOUVER,

Plaintiff,

v.

SIERRA MARIE OLIVER,

Defendant.

No. T00385657

OMNIBUS DEMAND BY PLAINTIFF

PURSUANT to and in accordance with Rule CrRLJ 4.7(b) of the Criminal Code, Plaintiff makes demand for Discovery to be provided as indicated below:

(1) Except as otherwise provided by protective orders or as to matters not subject to disclosure, Plaintiff demand immediate disclosure to the prosecuting authority the following material and information within his or her possession or control concerning:

1. The names and addresses of persons whom the defendant intends to call as witnesses at the hearing or trial, together with any written or recorded statements and the substance of any oral statements of such witnesses;
2. Any information known concerning prior convictions on persons other than the defendant whom the defense intends to call as witnesses at the hearing or trial.

- 1 3. Whether or not the defendant will rely on an alibi, and if so, to furnish a list of
- 2 his alibi witnesses as indicated above;
- 3 4. Any books, papers, documents, photographs, or tangible objects which the
- 4 defendant intends to use in the hearing or trial;
- 5 5. Any expert witnesses whom the defendant will call at the hearing or trial, the
- 6 subject of their testimony, and any reports relating to the subject of their
- 7 testimony that they have submitted to the defendant;
- 8 6. Any claim of incompetency, insanity or diminished capacity;
- 9 7. Whether his or her prior convictions will be stipulated or need to be proved;
- 10 8. Whether defendant will stipulate to continuous chain of custody of evidence
- 11 from acquisition to trial;
- 12 9. The general nature of his or her defense;
- 13 10. Unless the court orders otherwise, discoverable materials shall be made
- 14 available not later than 14 days prior to the date set for trial, or Plaintiff will
- 15 make appropriate motion to the court for non-compliance with this demand.
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19 Compliance with this demand is expected prior to Readiness Hearing.

20 **Continuing duty to disclose:** If, after compliance with this rule or orders pursuant to it, a

21 party discovers additional materials or information which is subject to disclosure, he or she

22 shall promptly notify the other party or his or her lawyer of the existence of such additional

23 material. If the additional material or information is discovered during trial, the court shall

24 also be notified.

25 **Sanctions:** If, at any time during the course of the proceedings, it is brought to the attention

26 of the court that a party has failed to comply with an applicable discovery rule or an order

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1 issued pursuant thereto, the court may order such party to permit the discovery of material
2 and information not previously disclosed, grant a continuance, or enter such other order as it
3 deems just under the circumstances. A lawyer's willful violation of an applicable discovery
4 rule or an order issued pursuant thereto may subject the lawyer to appropriate sanctions by
5 the court.
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7 DATED: June 1, 2026
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9 s/ Kevin McClure
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