

# EXHIBIT A

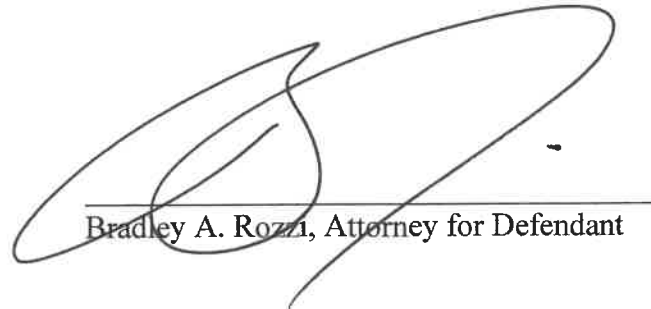
STATE OF INDIANA )  
 )  
 )ss:  
COUNTY OF CARROLL )

IN THE CARROLL CIRCUIT COURT  
  
CAUSE NO. 08C01-2210-MR-000001

STATE OF INDIANA )  
 )  
 )  
vs. )  
 )  
 )  
RICHARD M. ALLEN )

**NOTICE OF DISCOVERY**

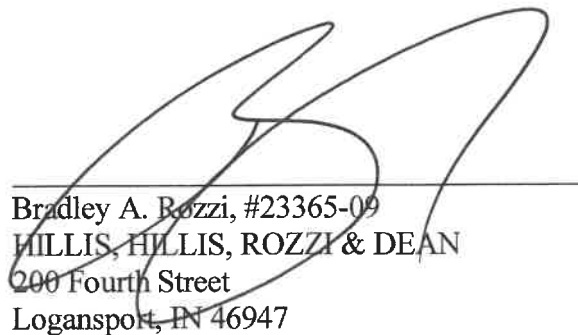
Comes now the Defendant, Richard Allen, by Counsel, Bradley A. Rozzi, and serves upon the Indiana Department of Corrections, c/o Westville Correctional Facility, 5501 S 1100 W, Westville, IN 46391, a Subpoena and Request for Production to Non-Party to be answered within thirty (30) days from the date of service. See attached.



Bradley A. Rozzi, Attorney for Defendant

**CERTIFICATE OF SERVICE**

I certify that I have served a copy of this document by first class U.S. Mail, postage prepaid upon Indiana Department of Corrections, c/o Westville Correctional Facility, 5501 S 1100 W, Westville, IN 46391 and by the County e-filing system upon the Carroll County Prosecutor's Office and Andrew J. Baldwin, the 19<sup>th</sup> day of May, 2023.



Bradley A. Rozzi, #23365-09  
HILLIS, HILLIS, ROZZI & DEAN  
200 Fourth Street  
Logansport, IN 46947

HILLIS, HILLIS,  
ROZZI & DEAN, LLC  
ATTORNEYS AT LAW  
200 FOURTH ST.  
LOGANSPORT, IN 46947  
(574) 722-4500  
FAX (574) 722-2659

JOHN R. HILLIS  
I.D. #7533-09  
BRADLEY A. ROZZI  
I.D. #23365-09  
BRADEN J. DEAN  
I.D. #31941-34

**EXHIBIT A**

STATE OF INDIANA )  
 )ss:  
COUNTY OF CARROLL )

IN THE CARROLL CIRCUIT COURT  
CAUSE NO. 08C01-2210-MR-000001

STATE OF INDIANA )  
 )  
vs. )  
 )  
RICHARD M. ALLEN )

**SUBPOENA**

**THE STATE OF INDIANA, TO THE SHERIFF, GREETINGS:**

You are hereby commanded to summon the **Indiana Department of Corrections, c/o Westville Correctional Facility, 5501 S 1100 W, Westville, IN 46391**, to permit Attorney, Bradley A. Rozzi, Attorney, Andrew J. Baldwin, and their agents to enter onto the Westville Correctional Facility for the purpose of inspecting, measuring, surveying, and photographing the individual cell block(s), and surrounding facility, wherein Defendant Richard Allen has been continuously incarcerated since November of 2022. Said event shall occur within thirty (30) days of the issuance of this Subpoena as referenced below.

WITNESS, this 19th day of May, 2023.

HILLIS, HILLIS, ROZZI & DEAN

By: 

Bradley A. Rozzi, Attorney for Defendant  
200 Fourth Street  
Logansport, IN 46947  
574-722-4560

HILLIS, HILLIS,  
ROZZI & DEAN, LLC  
ATTORNEYS AT LAW  
200 FOURTH ST.  
LOGANSPORT, IN 46947  
(574) 722-4560  
FAX (574) 722-2659

JOHN R. HILLIS  
I.D. #7533-09  
BRADLEY A. ROZZI  
I.D. #23365-09  
BRADEN J. DEAN  
I.D. #31041-34

**EXHIBIT A**

STATE OF INDIANA )  
 )ss:  
COUNTY OF CARROLL )

IN THE CARROLL CIRCUIT COURT  
CAUSE NO. 08C01-2210-MR-000001

STATE OF INDIANA )  
 )  
vs. )  
 )  
RICHARD M. ALLEN )

**REQUEST FOR PRODUCTION TO NON-PARTY**

Pursuant to Trial Rule 34 (A)(2) of the Indiana Rules of Trial Procedure, attorney Bradley A. Rozzi requests, **Indiana Department of Corrections, c/o Westville Correctional Facility, 5501 S 1100 W, Westville, IN 46391**, a Non-Party, to produce and permit the examination of the following:

To permit entry onto designated land or other property in the possession or control of the Indiana Department of Corrections (c/o Westville Correctional Facility) for the purpose of inspecting, measuring, surveying, and photographing the individual cell block(s), and surrounding facility, wherein Defendant Allen has been continuously incarcerated since November of 2022 pursuant to the Safekeeping Order entered herein on November 3, 2022.

Attorney, Bradley A. Rozzi, Attorney, Andrew J. Baldwin, and their agent are available to inspect the premises, upon reasonable notice, Monday through Friday from 8:00 a.m. to 5:00 p.m. or on any other time convenient for the Department of Corrections and Movants.

Bradley A. Rozzi requests that such production be made to Bradley A. Rozzi, by mailing a copy of said documents to Bradley A. Rozzi, 200 Fourth Street, Logansport, Indiana 46947.

This Request for Production is made pursuant to Trial Rule 34(C), and the producing party is entitled to security against damages or payment of damages resulting from this request and may respond to this request by submitting to its terms, by proposing different terms, by objecting specifically or generally to this request by serving a written response or by moving to quash as permitted by Trial Rule 45(B).

Failure to respond to this Request for Production or to object to it or to move to quash, as provided by the Indiana Rules of Civil Procedure within (30) days from its receipt, may subject producing party to a Motion for Sanctions, pursuant to Trial Rule 37 of the Indiana Rules of Trial Procedure.

HILLIS, HILLIS,  
ROZZI & DEAN, LLC  
ATTORNEYS AT LAW  
200 FOURTH ST.  
LOGANSPORT, IN 46947  
(574) 722-4560  
FAX (574) 722-2659

JOHN R. HILLIS  
I.D. #7533-09  
BRADLEY A. ROZZI  
I.D. #23365-09  
BRADEN J. DEAN  
I.D. #31941-34

**EXHIBIT A**

HILLIS, HILLIS, ROZZI & DEAN

By: \_\_\_\_\_

  
Bradley A. Rozzi, Attorney for Defendant  
200 Fourth Street  
Logansport, IN 46947

**CERTIFICATE OF SERVICE**

I certify that I have served a copy of this document by first class U.S. Mail, postage prepaid upon Indiana Department of Corrections, c/o Westville Correctional Facility, 5501 S 1100 W, Westville, IN 46391 and the Carroll County Prosecutor's Office, the 17<sup>th</sup> day of May, 2023.

  
Bradley A. Rozzi, #23365-09  
HILLIS, HILLIS, ROZZI & DEAN

HILLIS, HILLIS,  
ROZZI & DEAN, LLC  
ATTORNEYS AT LAW  
200 FOURTH ST.  
LOGANSFORT, IN 46947  
(574) 722-4560  
FAX (574) 722-2659

JOHN R. HILLIS  
I.D. #7533-09  
BRADLEY A. ROZZI  
I.D. #23365-09  
BRADEN J. DEAN  
I.D. #31941-34

**EXHIBIT A**