

STATE OF INDIANA)
) ss.
COUNTY OF DEARBORN)
)
STATE OF INDIANA)
)
v.)
)
DANIEL BREWINGTON)

IN THE DEARBORN SUPERIOR COURT NO.2
GENERAL TERM, 2011
CAUSE NO. 15DO2-1103-FD-084

CLERK OF DEARBORN CIRCUIT COURT
M. Joseph Kisor

FILED
AUG 9 2011

MOTION FOR CONFIDENTIALITY OF JUROR'S NAMES AND IDENTITIES

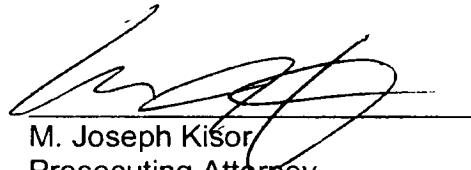
Comes now the State of Indiana by M. Joseph Kisor, Chief Deputy Prosecuting Attorney for the Seventh Judicial Circuit of Indiana, and hereby moves the Court for an order keeping the names and identities of the jurors confidential from all parties. There is a strong reason to believe the jury needs protection from the Defendant for the following reasons.

1. The Defendant has previously attempted to interfere with the judicial process, including the continuous and long-term harassment of witnesses, judges, and attorneys involved.
2. The Defendant has previously made threats against witnesses, judges, and attorneys involved in the current court proceedings.
3. Jurors' safety would be jeopardized by revealing their names and identities to the parties based on the Defendant's past behavior.
4. The names and identities of the jurors must be kept confidential to prevent potential intimidation of the jurors.
5. The names and identities of the jurors must be kept confidential to prevent them from being contacted or harassed about the court proceedings.



Memorandum in support thereof, the State of Indiana attaches *Major v. State*,
873 N.E. 2d 1120 (Ind. Ct. App. 2007).

WHEREFORE, the State respectfully requests the names and identities of the jurors be kept confidential from all parties because there is a strong reason to believe the jury needs protection.



M. Joseph Kisor
Prosecuting Attorney
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Seventh Judicial Circuit
215 W. High Street
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served by personal delivery or U.S. Mail, upon Bryan E. Barrett, Attorney for Defendant and Special Judge, Honorable Brian D. Hill on the date filed.



M. Joseph Kisor