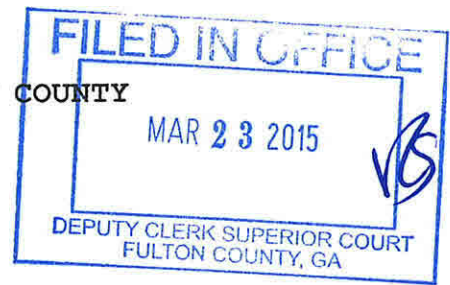


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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA



STATE OF GEORGIA)	
)	
vs.)	CRIMINAL CASE
)	14SC131684
JOY LASKAR,)	
)	<u>McBurney</u>
Defendant.)	

DISCOVERY AND MOTIONS SCHEDULE CONSENT ORDER

1.

Defendant Joy Laskar was indicted on December 30, 2014, in the above-styled case.

2.

Defendant is scheduled to be arraigned on March 19, 2015, and will waive formal arraignment.

3.

Defendant is represented by Craig A. Gillen.

4.

Senior Assistant Attorney General David S. McLaughlin is prosecuting this case on behalf of the Attorney General.

5.

Throughout the investigation of this case and since the return of the indictment, Mr. McLaughlin and Mr. Gillen have been in regular consultation with each other regarding matters related to this case, including discovery.

6.

Defendant has opted into discovery pursuant to O.C.G.A. Title 17, Chapter 16, Article 1 and filed his discovery motion.

7.

Pursuant to O.C.G.A. §§ 17-10-2, et. Seq., the State has filed a motion for reciprocal discovery.

8.

The State and Defendant recognize there is a vast and sweeping volume of documents, records, materials, and items subject to discovery in this case.

9.

Mr. McLaughlin and Mr. Gillen have been and will continue to be working in a cooperative effort to insure there will be an orderly discovery production which will afford each party ample opportunity to make productions and to review, inspect, and copy productions.

10.

The documents, records, materials, and items subject to discovery in this case are mostly in the possession of the State, are in both digital and paper formats, number in the hundreds of thousands of pages, and include but are not limited to:

- 1) GBI investigative file;
- 2) Approximately 20,000 pages of records from the Georgia Tech Research Corporation ("GTRC");
- 3) Dozens of boxes of evidence seized during search warrants including more than 40 computer hard drives;
- 4) Transcripts, audio tapes, and documents and materials related to employment hearings;
- 5) Several terabytes of data from the Georgia Tech computer system including emails, documents, computer chip test results, and other relevant data; and
- 6) Approximately 10 boxes of documents and records consolidated for open records request productions related to this case.

11.

The State and Defendant recognize it will take a period of time to produce discovery and a longer period of time to review discovery.

12.

Mr. McLaughlin and Mr. Gillen acknowledge and understand that additional discovery in France and South Korea may be warranted in this case which could require additional time for discovery.

13.

Mr. McLaughlin and Mr. Gillen acknowledge and understand that discovery production and review in this case will be interrupted by Mr. Gillen's involvement in the June 2015 retrial of Burrell Ellis in DeKalb County Superior Court, a trial expected to last six weeks.

14.

Given the massive discovery material and the potential need for obtaining international evidence, the State and the defense request that, in the interest of justice, the Court extend the time for filing any pre-trial motions, demurrers, pleas, or notices in this case until August 1, 2015.

15.

Therefore, based upon the foregoing and the agreement of the State and Defendant, it is ordered:

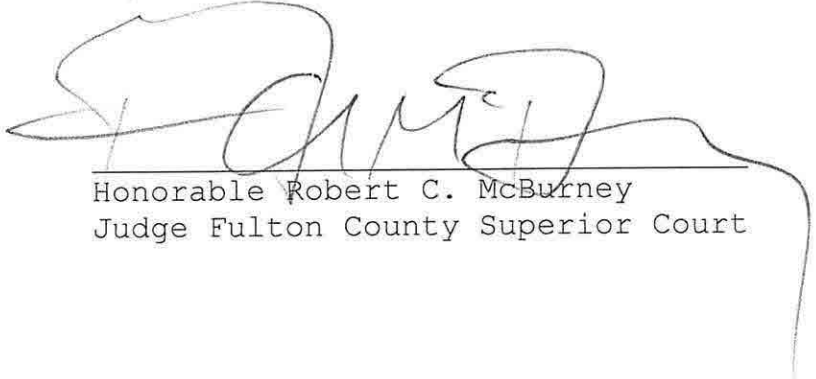
- 1) The State shall produce and make available for review, inspection, and copying all documents, records, materials, and items subject to discovery within 30 days of the signing of this order;
- 2) Defendant shall have 60 days to review discovery produced by the State provided that an extension of additional time may be granted upon written

motion by the Defendant or the consent of both parties;

- 3) Following production of discovery of the State, Defendant shall have 60 days to provide reciprocal discovery to the State;
- 4) In lieu of a discovery status hearing, by May 15, 2015, the State and Defendant shall make a written report to the Court of the status the State's and Defendant's productions;
- 5) Both parties shall have until August 1, 2015, to file pre-trial motions, demurrers, pleas, or notices, and a status and motions hearing will be scheduled for on or around August 15, 2015;
- 6) In the event the Burrell Ellis trial does not proceed in June 2015 as scheduled, Defendant shall notify the Court immediately such that this order may be modified as needed;
- 7) Both parties should supplement discovery expeditiously in the event additional discoverable documents, records, materials, and items are uncovered; and
- 8) Through the discovery and pre-trial period, the State and Defendant shall endeavor to narrow the scope of documents, records, materials, and items

produced during discovery to those things which will actually be used during trial and shall advise each other and the Court of the documentary evidence expected to be used during trial.

SO ORDERED this 23rd of March, 2015



Honorable Robert C. McBurney
Judge Fulton County Superior Court

Consented to by:

David S. McLaughlin
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