

- b. Keith Wood works locally as an insurance broker in his own small business.
 - c. Keith Wood is married and has seven children.
 - d. It is not a threat to public safety to peacefully hand out pamphlets in front of the courthouse.
 - e. Keith Wood is charged with non-violent crimes.
 - f. Keith Wood does not have any drug or substance abuse issues.
 - g. Keith Wood has never missed a court date where he was required to appear.
4. Given Mr. Wood's history and the charges, Magistrate Lyons violated Mr. Wood's 8th Amendment rights under the United States Constitution and his rights under Article I, Section 16 of the Michigan Constitution, by setting such an unreasonable, excessive, and punitive bond of \$150,000.00.
 5. Mr. Wood requests that his bond be reduced to a personal recognizance bond.
 6. Further, Mr. Wood requests that the full \$15,000.00 he posted on his credit card for his original bond be refunded in full, without any administrative fees.

WHEREFORE, Defendant Keith Wood respectfully requests that this Honorable Court reduce his bond to a personal recognizance bond, grant a full refund of the bond he posted, and grant such other and further relief as is just and appropriate.

MOTION FOR DISCOVERY

NOW COMES the Defendant, **KEITH ERIC WOOD**, by and through his attorneys, Kallman Legal Group, PLLC, and support of his Motion for Discovery pursuant to MCR 6.201 hereby states as follows:

1. Defendant Keith Wood is currently charged with Obstruction of Justice (Felony) and Jury Tampering (Misdemeanor) for handing out pamphlets to a potential jury pool.
2. The prosecutor's entire case revolves around his assertion that the jury pool was interfered with by Mr. Wood.
3. MCR 6.201(I) permits the court to modify the standard discovery rules for good cause shown.
4. Since everyone in the jury pool is a potential witness in this case, it is imperative that Mr. Wood be given the opportunity to see what those jury pool members witnessed on the day in question.

5. Members of the jury pool may have exculpatory or impeachment evidence which is critical to Mr. Wood's defense in this case.

WHEREFORE, Defendant Keith Wood respectfully requests that this Honorable Court issue an order that the Mecosta County District Court release the names and contact information of the entire jury pool that was called to the Court on November 24, 2015 to both parties, and grant such other and further relief as is just and appropriate.

Dated: December 15, 2015.

David A. Kallman
Attorney for Keith Wood

PROOF OF SERVICE

I, David A. Kallman, hereby affirm that on the date stated below I delivered a copy of the above Motion to Reduce Bond and for Discovery, with supporting brief, upon the Mecosta County Prosecutor via First Class Mail, postage prepaid thereon, by fax to (231) 796-3050, and by e-mail to bthiede@co.mecosta.mi.us. I hereby declare that this statement is true to the best of my information, knowledge and belief.

Dated: December 15, 2015.

David A. Kallman