

Timothy Baldwin  
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Attorney for Defendant

**IN THE DISTRICT COURT OF THE ELEVENTH JUDICIAL DISTRICT  
OF THE STATE OF MONTANA AND FOR THE COUNTY OF FLATHEAD**

STATE OF MONTANA,  Plaintiff,  vs.  Cory Robert Franklin,  Defendant.	Case No: DC-13-465(C)  <b>NOTICE OF SERVING REQUEST FOR INTERVIEWS</b>
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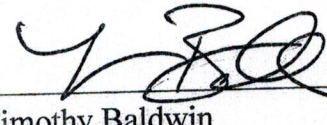
COMES NOW the Defendant, Cory Robert Franklin, by and through the undersigned counsel, and hereby files notice of serving Flathead County Attorney, Ed Corrigan; Deputy County Attorney, Kenneth R. Park; Sheriff Deputy, Agent McKeag Johns; and Sheriff Chuck Curry with a formal request to submit to recorded interviews pursuant to Section 46-15-201(1)(c), MCA, which was delivered to the same on June 17, 2014 via USPS first class mail. True and accurate copies of said requests are attached hereto as **Exhibit A**.

Respectfully submitted this 17th day of June, 2014.

  
Timothy Baldwin

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by USPS first class mail to the Flathead County Attorney, 920 S. Main St., 2nd Fl, Kalispell, MT 59901, on June 17, 2014.

  
Timothy Baldwin

# EXHIBIT A

Tim Baldwin, Attorney Law

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Office: 210 2<sup>nd</sup> St. W, Ste. 200, Kalispell, MT 59901  
Mail: P.O. Box 1520, Kalispell, MT 59903  
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June 17, 2014

Office of the Flathead County Sheriff  
920 S. Main St., Ste. 100  
Kalispell, MT 59901

Re: Case: *State v. Cory Franklin*, DC-13-465  
Subject: Request for Interviews

Sheriff Chuck Curry,

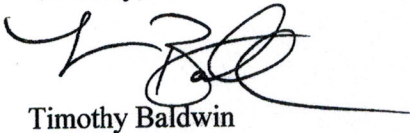
I represent Mr. Cory Franklin in the above-referenced case as well as in DC-14-128 and in DC-04-15. My client's wife, Kristina Franklin, has provided sworn affidavits wherein she details conversations she had with Mr. Kenneth "Rusty" Park and Agent McKeag Johns concerning me, my representation of Mr. Franklin, Mr. Park and Ed Corrigan. I have attached copies of said affidavits hereto.

In light of the very serious claims that arise from these affidavits, I am hereby requesting, pursuant to Section 46-15-201(1)(c), MCA, that you and Mr. Johns, your employee, submit to a recorded interview concerning the matters brought to light in said affidavits. I am also requesting that you and Mr. Johns bring to the interview the following:

- A copy of all correspondence, in whatever format, including written, electronic and cellular, between and among you, McKeag Johns, Kenneth Park and/or Ed Corrigan concerning me, Kristina Franklin and/or Cory Franklin since the day Cory Franklin was arrested in DC-13-465;
- All records of phone tolls since the day Cory Franklin was arrested in DC-13-465 wherewith you, McKeag Johns, Kenneth Park and/or Ed Corrigan communicated to each other about me, Kristina Franklin and/or Cory Franklin.

I filed a request for hearing on the above-stated motion today and requested that Judge Ulbricht not hold a hearing on my motion until I have conducted all interviews. Given the seriousness and time-sensitivity of my client's matters, I am requesting that you provide me within 7 days from the date of this letter with a written response indicating whether you and Mr. Johns will submit to my request. If you agree to submit to my request, your office and mine can coordinate a date and time for said interviews. If you refuse to submit to my request, I request that you respond to me in writing stating the factual and legal basis for your refusal. Thank you.

Sincerely,



Timothy Baldwin



Tim Baldwin, Attorney Law

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June 17, 2014

Office of the Flathead County Attorney  
920 S. Main St., Ste. 201  
Kalispell, MT 59901

Re: Case: *State v. Cory Franklin*, DC-13-465  
Subject: Request for Interviews

Mr. Ed Corrigan,


As you know, I represent Mr. Cory Franklin in the above-referenced case as well as in DC-14-128 and in DC-04-15. My client's wife, Kristina Franklin, has provided sworn affidavits wherein she details conversations she had with Mr. Kenneth "Rusty" Park and Agent McKeag Johns concerning me, my representation of Mr. Franklin, Mr. Park and you. I have attached copies of said affidavits hereto.

In light of the very serious claims that arise from these affidavits, I am hereby requesting, pursuant to Section 46-15-201(1)(c), MCA, that you and Mr. Park, your employee, submit to a recorded interview concerning the matters brought to light in said affidavits. I am also requesting that you and Mr. Park bring to the interview the following:

- A copy of all correspondence, in whatever format, including written, electronic and cellular, between and among you, McKeag Johns, Kenneth Park and/or Chuck Curry concerning me, Kristina Franklin and/or Cory Franklin since the day Cory Franklin was arrested in DC-13-465;
- All records of phone tolls since the day Cory Franklin was arrested in DC-13-465 wherewith you, McKeag Johns, Kenneth Park and/or Chuck Curry communicated to each other about me, Kristina Franklin and/or Cory Franklin.
- A copy of all documents, in whatever format including written, electronic and cellular, concerning my job application for employment at the Office of the Flathead County Attorney.

I filed a request for hearing on the above-stated motion today and requested that Judge Ulbricht not hold a hearing on my motion until I have conducted all interviews. Given the seriousness and time-sensitivity of my client's matters, I am requesting that you provide me within 7 days from the date of this letter with a written response indicating whether you and Mr. Park will submit to my request. If you agree to submit to my request, your office and mine can coordinate a date and time for said interviews. If you refuse to submit to my request, I request that you respond to me in writing stating the factual and legal basis for your refusal. Thank you.

Sincerely,



Timothy Baldwin