

4. Each of these agencies may have information related to Williford's ongoing post-conviction efforts and his anticipated motion for leave to file a successive post-conviction petition.
5. In addition, Williford seeks any and all communications between the Northern Illinois Regional Crime Laboratory regarding work done under the current case number, 00 CF 1920, under NIRCL number 14-4780, under NIRCL No. 92-55313, or any other matter associated with the home invasion of Delwin Foxworth, the rape and murder of Holly Staker, and/or Marvin Williford.
6. Williford also seeks leave to require the State to provide any and all evidence otherwise discoverable and compelled to be disclosed by the State as matter of due process per *Brady v. Maryland*, 373 U.S. 83 (1963), *Giles v. Maryland*, 386 U.S. 66 (1967), and *U.S. v. Bagley*, 473 U.S. 667 (1985).
7. Good cause has been shown here. Williford's conviction rests upon a thin reed: a single eyewitness identification at trial years after the crime and that was the result of repeated and undisputedly suggestive identification procedures long after the crime. Significant DNA evidence excludes Williford and links to the person who raped and killed Holly Staker. Since this Court last heard evidence about this case, significant DNA results and investigation has occurred, leading to the identification of potential alternative suspects. Williford—who has steadfastly maintained his innocence—merely seeks all of the material evidence that exists that could exculpate him or provide further insight into his wrongful conviction.

WHEREFORE, for all the reasons stated above, Mr. Williford respectfully requests that this Court permit Williford to conduct limited post-conviction discovery, as described above.

Dated: November 22, 2022

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'D. Owens', is written above a solid horizontal line.

David B. Owens
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