

STATE OF WISCONSIN

CIRCUIT COURT

MANITOWOC COUNTY

STATE OF WISCONSIN,

FILED

Plaintiff,

MAR - 8 2016

Case No. 2005CF000381

v.

STEVEN AVERY,

CLERK OF CIRCUIT COURT
MANITOWOC COUNTY, WI

Defendant.

**MOTION TO CORRECT THE RECORD AND
MOTION FOR ADDITIONAL TIME TO INSPECT THE RECORD**

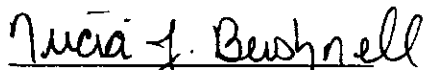
Defendant Steven Avery, by and through undersigned counsel, hereby moves this Court to correct the record and to further a lot additional time to review the record pursuant to Wis. Stat. 809.15(3). In support of his motion, Mr. Avery states as follow:

1. On February 29, 2016, undersigned counsel received notice that the record had been compiled and was available for inspection. According to the notice, the record would be sent to the Court of Appeals on March 10, 2016.
2. Wis. Stat. 809.15(2) provides that "At least 10 days before the due date for filing the record in the court, the clerk of the circuit court shall notify in writing each party appearing in the circuit court that the record has been assembled and is available for inspection."
3. As noted in the clerk's February 10, 2016 request for extensions to file the record, the record in this case is of "considerable size." The current compilation indicates that it is comprised of 453 documents.
4. Significant time is needed for undersigned counsel to review the record and ensure that it is complete. In addition to the number of hours necessary to

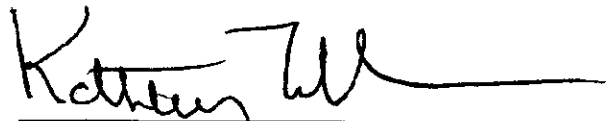
review the documents, counsel must also have adequate notice to travel to the court to review the documents.

5. In the limited review counsel has been able to conduct, it appears information is missing. Many of the documents listed in the record were previously sealed documents which have since been ordered unsealed. *See e.g.*, R.361 "Fourth Order to Unseal Documents." However, the record currently still contains cites only to "envelope[s] containing" the necessary records. *See e.g.*, R. 48. For those and other documents, there are no page numbers listed, indicating that the documents are only one page in length. However, a number of these records must be substantially longer, including but not limited to Records 48, 49, 55, 58, 59, 67, 69, 71, 119, 124, 142, 160, and 165.
6. Undersigned counsel respectfully requests the Clerk review the record and correct it to ensure that all Record numbers accurately refer to now unsealed documents and that all Records numbers further reflect the number of pages in each document so they can be properly referenced in the parties briefs.
7. In addition, undersigned counsel also requests at least 21 days notice be provided to ensure adequate time for counsel to review the record before it is filed with the Court of Appeals.

Respectfully submitted,



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ATTORNEYS FOR MR. AVERY

CERTIFICATE OF SERVICE

I certify that, on March 8, 2016, a true and correct copy of the foregoing Motion to Correct the Record and Motion for Additional Time to Inspect the Record was furnished by first-class U.S. mail, postage prepaid to:

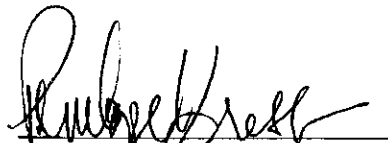
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