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WORK PRODUCT

CASE: STATE VS Billy Lee Oatney C962556CR

WITNESS: Joseph P. Shay

1117 Redwood Ave. #13 El Cajon, CA 92019-2100

619-579-5268

ATTORNEY: John P. Manning

DATE: 5 March 1998

TIME: 09:00-09:30

This witness knows Billy played D & D, but doesn't know anything about what Billy's playing habits are. He does not know Johnston, and because Billy and Shay were in different housing units after about 6-8 months, he cannot address the issues Johnston raised one way or the other, beyond that 6 to 8 month window.

This witness is better for mitigation as he can address Billy's ability to get along with his prison peer. I believe both Dr. Cunningham and I would consider it worth bringing him up, so that we have a cross between experts, inmate population, and prison authorities addressing Billy's ability to conform to prison life.

He needs plane tickets. Maybe the Judge could expedite travel arrangements for this man. He is willing to come up without all the subpoena stuff. He is available by phone in the mornings before noon. He leaves for work by 1:30 PM