

IN THE IOWA DISTRICT COURT IN AND FOR SOUTH LEE COUNTY

STATE OF IOWA,

Plaintiff

vs.

BENJAMIN G. TRANE,

Defendant.

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Cause No. **FECR009152**

**MOTION FOR EXTRAORDINARY
DISCOVERY EXPENSE**

COMES NOW, the defendant BENJAMIN G. TRANE, by and through his attorney, Lisa K. Schaefer, and hereby requests court approval to incur and be reimbursed for an extraordinary fee expense outside of the State Public Defender's ordinary reimbursement and in support thereof, states as follows:

1. The defendant is charged with Sexual Abuse – 3rd Degree, a Class C Felony; Sexual Exploitation by a Counselor, a Class D. Felony, and Child Endangerment, an aggravated misdemeanor.
2. The undersigned was appointed to represent the defendant in the above-referenced matter pursuant to her contract with the Iowa State Public Defender.
3. The State advises that there is approximately 5-6 TB of documentary evidence to provide pursuant to the discovery agreement that is contained on an external hard drive in the possession of the DCI.
4. The State indicates that they will make copy of the evidence for the defense if they are provided a brand new external hard drive with the manufacturer's seal intact for security purposes.

5. The cost of the external hard drive is approximately \$200 - \$250 and is not an ordinary expense that the State Public Defender reimburses.
6. The State does not resist the defendant's application for this extraordinary expense for discovery.
7. The extraordinary expense is incurred in good faith and for purposes of providing effective defense to the defendant.

WHEREFORE, the undersigned requests the Court to enter an order allowing the undersigned to be incur and be reimbursed for the extraordinary expense of purchasing a 6 TB external digital storage device not to exceed \$250 in cost.



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