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CIRCUIT COURT OF
LEE COUNTY, ALABAMA
MARY B. ROBERSON, CLERK

IN THE CIRCUIT COURT FOR LEE COUNTY, ALABAMA

STATE OF ALABAMA,)	
)	
v.)	Case No. CC-2014-000565
)	
MICHAEL GREGORY HUBBARD,)	
)	
Defendant.)	

OBJECTION TO STATE'S MOTION TO SUPPLEMENT THE RECORD

Comes Defendant and moves this Honorable Court to deny the State's Motion to Supplement the Record filed on February 24, 2017 (Doc. 800). The January 8, 2016 hearing was an ex parte hearing between former counsel for the Defendant and the Court concerning the reasons for counsel's withdrawal as counsel. The State was correctly barred from attending this hearing. Now the State is attempting to discover the privileged substance of this hearing. This hearing has nothing to do with the merits of this case or appeal and is being sought only as an effort by the State to improperly pry into the attorney-client relationship of the Defendant and prior counsel.

WHEREFORE, Defendant Hubbard moves this Honorable Court to deny the State's Motion to supplement the record.

Respectfully submitted,

s/William J. Baxley

William J. Baxley

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2017 a true and correct copy of the foregoing pleading has been filed electronically with the Clerk of the Court in a manner that will result in its automatic service upon all counsel of record, as follows:

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