

STATE OF WISCONSIN CIRCUIT COURT MANITOWOC COUNTY

STATE OF WISCONSIN,

vs. Plaintiff, MANITOWOC COUNTY
STATE OF WISCONSIN
FILED

JAN 10 2006

DEFENDANT'S
NOTICE OF MOTION
Case No. 05 CF 381

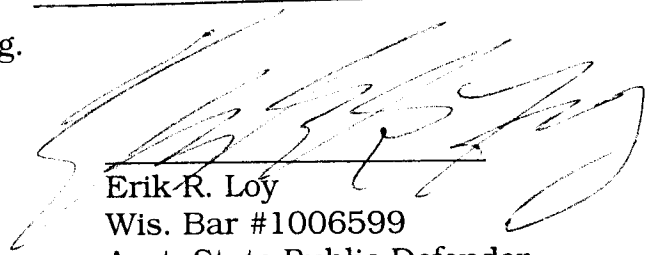
STEVEN AVERY,

CLERK OF CIRCUIT COURT

Defendant.

TO: Atty. Kenneth Kratz, Special Prosecutor

PLEASE TAKE NOTICE that the defendant, by his undersigned attorney, has moved the Court for relief as set out in the attached motion. Said motion will be heard at the Manitowoc County Courthouse, Circuit Court, Branch One, on **January 17 at 9:00 a.m.**, the Honorable Patrick Willis presiding.



Erik R. Loy
Wis. Bar #1006599
Asst. State Public Defender
933 South 8th Street, #102
Manitowoc, WI 54220
920/683-4690

MANITOWOC COUNTY
STATE OF WISCONSIN
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JAN 10 2006

DISTRICT ATTORNEY

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(1)

STATE OF WISCONSIN

CIRCUIT COURT

MANITOWOC COUNTY

STATE OF WISCONSIN,
Plaintiff,

AMENDED
MOTION FOR BAIL REDUCTION
Case No. 05 CF 381

vs.

STEVEN AVERY,
Defendant.

MANITOWOC COUNTY
STATE OF WISCONSIN
FILED

JAN 10 2006

CLERK OF CIRCUIT COURT

The defendant, appearing specially, hereby moves the Court to reduce his bail to a cash bail of \$100,000.00 with appropriate conditions, such as reporting to law enforcement agencies, or other conditions the Court deems reasonable. The defendant further moves, pursuant to sec. 969.03(1)(d), that his bail be amended to an appearance bond secured by solvent sureties.

In support of this request, it is asserted:

(1) He is a lifetime resident of Manitowoc County except during periods of incarceration.

(2) He currently resides at 12932 Avery Road, Two Rivers, Wisconsin.

(3) He has substantial ties to the community in that his parents, siblings, and children all reside in Manitowoc County.

(4) Although it was clear from early in the investigation that law enforcement was focused on him as a suspect, Mr. Avery did not flee the jurisdiction nor did he fail to cooperate in the investigation. To the contrary, Mr. Avery gave investigating officers all the information he could when they questioned him and cooperated in a search of his residence.

(5) His family has also been very cooperative by allowing law enforcement officers and searchers access to their property.

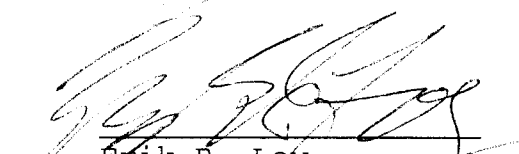
(6) He has been unable to post the bail currently set.

(7) His parents are willing to execute surety bonds on his behalf. They estimate that the value of their real estate is approximately \$250,000.00.


This motion is made subject to continuing objection to the Court's jurisdiction.

Dated this 10th day of January, 2006.

Respectfully submitted,



Erik R. Loy
Wis. Bar #1006599
Attorney for Defendant



Craig Johnson
Wis. Bar #1022627
Attorney for Defendant

State Public Defender
933 S. 8th St., #102
Manitowoc, WI 54220
920-683-4690