

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION

UNITED STATES OF AMERICA

vs.

DAVID ZACHARY SCRUGGS

Case: 3:07CR00192-NBB-SAA

**DEFENDANT DAVID ZACHARY SCRUGGS'S
RESPONSE TO GOVERNMENT'S FIRST MOTION TO ALLOW DISCLOSURE
OF CERTAIN EVIDENCE TO THE PROSECUTION AND INVESTIGATIVE
TEAM AND TO REQUIRE ANY OBJECTIONS TO SUCH DISCLOSURE TO BE
MADE PRIOR TO DISCLOSURE BY USA AS TO RICHARD F. "DICKIE"
SCRUGGS, DAVID ZACHARY SCRUGGS AND SIDNEY A. BACKSTROM**

COMES NOW, Defendant David Zachary Scruggs, by and through his undersigned attorneys, and files this response to the government's Motion to Allow Disclosure of Certain Evidence to the Prosecution and Investigative Team and to Require any Objections to Such Disclosure be Made Prior to Disclosure by USA as to Richard F. "Dickie" Scruggs, David Zachary Scruggs and Sidney A. Backstrom, and would show unto the court as follows:

The government has indicated its intent to release certain "taint team" documents seized from the Scruggs Law Firm on November 27, 2007. Defendant Zach Scruggs has reviewed the provided documents and does not object to their release under the terms proposed in the government's motion.

Respectfully submitted, this the 20th day of March, 2008.

Dated: March 20, 2008

By: /s/ Todd Graves
Todd P. Graves (*Pro Hac Vice*)
Nathan F. Garrett (*Pro Hac Vice*)
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For Defendant
David Zachary Scruggs

CERTIFICATE OF SERVICE

I, Todd Graves, do hereby certify that on the 19th day of March, 2008, I have electronically filed the foregoing Defendant David Zachary Scruggs's Motion for Continuance of Criminal Case using the ECF System, which sent notification of such filing to Thomas W. Dawson, Assistant United States Attorney, Robert H. Norman, Assistant United States Attorney, David Anthony Sanders, Assistant United States Attorney, Frank W. Trapp, J. Rhea Tannehill, Jr., and John W. Kecker.

/s/ Todd P. Graves

Todd P. Graves