

No.: S26A0459

IN THE

Supreme Court of Georgia

HANNAH RENEE PAYNE,
Appellant,

v.

THE STATE OF GEORGIA,
Appellee

Appellant's Motion for Direct Supplemental Production

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Appellant Hannah Renee Payne respectfully moves this Court for clarification and for an order directing supplemental production by the State. In support, Appellant shows the following:

1. On March 20, 2026, this Court ordered counsel for the State to file, among other things, “the proposed order submitted to the trial court, as well as a copy of all communication between counsel and the trial court regarding the proposed order, including but not limited to any request for the proposed order and the submission of the proposed order.”
2. On March 27, 2026, the State filed a supplemental brief and exhibits in response to that order. The filing includes, among other things, a copy of the proposed order, an email from Deborah Leslie transmitting that proposed order to the trial court and staff attorney, relay confirmations, and an acknowledgment of receipt from the staff attorney.
3. Appellant was not served with that filing.
4. After obtaining a copy of the filing, undersigned counsel contacted the Clayton County District Attorney seeking clarification as to whether the State’s production was complete.
5. The basis for this request was a news article in which District Attorney Tasha Mosley acknowledged that she had apologized to the trial court for Deborah Leslie’s statements to the Supreme Court of Georgia.
6. Such an apology, if it occurred, would appear to be a “communication between counsel and the trial court regarding the proposed order.”
7. In response, District Attorney Tasha Mosley stated in writing: “I apologized and did not talk about the facts or anything of the case at

all.” She further stated that Ms. Leslie had provided the email communications ordered by this Court and that, if anything else were missing, she assumed this Court would order the State to provide it.

8. A screenshot of that email is below:

Mr. Fleischman-

An apology is not substantive. I apologized and did not talk about the facts or anything of the case at all. Sorry that this matter has caused you any discomfort. The Supreme Court was explicit in ordering Ms. Leslie to provide all email communications between her and the Judge to them. I think Mrs. Leslie provided that this morning in her filing. If there is anything else that is missing I assume the Supreme Court will order us to provide whatever is missing.

9. Ms. Mosley’s response appears to acknowledge a communication with the trial court that is not included in the State’s production.

10. This Court’s March 20 order did not limit production to communications that counsel deemed “substantive.” Rather, the Court ordered production of “all communication between counsel and the trial court regarding the proposed order.”

11. Appellant does not seek merits relief by this motion. Nor does Appellant ask this Court to make any finding regarding the propriety of any communication. Appellant seeks only to ensure complete compliance with this Court’s order and a complete record for this Court’s consideration.

For these reasons, Appellant respectfully requests that this Court:

a. clarify that its March 20, 2026 order requires production of all communications between counsel for the State and the trial court regarding

the proposed order, whether or not counsel regards any such communication as substantive; and

b. direct the State to supplement its production with any additional written or memorialized communications concerning the proposed order, including any apology or other communication referenced by District Attorney Mosley that has not yet been produced.

CERTIFICATE OF SERVICE

I hereby certify as follows. This submission does not exceed the word count limit imposed by Rule 20.

This the 27th day of March, 2026.

/s/ Andrew Fleischman

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CERTIFICATE OF SERVICE

I hereby certify that opposing counsel has been served by US Mail at:

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