

IN THE CIRCUIT COURT OF LAKE COUNTY, TENNESSEE AT TIPTONVILLE

STATE OF TENNESSEE,)	
)	
v.)	DOCKET NO.: 25-CR-11185
)	
AUSTIN DRUMMOND,)	
DEFENDANT.)	

MOTION TO QUASH OR IN THE ALTERNATIVE FOR AN IN CAMERA REVIEW

The State of Tennessee, Department of Children’s Services, moves this Honorable Court to quash the subpoenas for production of documentary evidence issued to the Department of Children’s Services or, in the alternative, for an order requiring an *in camera* review followed by a protective order as set out below. The Department’s motion is based upon the following:


1. A total of 5 subpoenas issued in this matter were received by the Records Custodian for the Department of Children’s Services requesting DCS records on the following individuals: Austin Drummonds; James Matthew Wilson, II; Adrianna Sabri Leolani Williams; Brayden Williams; and Cortney Sabri Rose.

2. The Department asserts that said subpoenas should be quashed, or in the alternative the Court should issue an order requiring an *in camera* review followed by a protective order for any records that may exist with the Department for these individuals.

3. The subpoenas request that the Department of Children’s Services produce records concerning reports of child abuse (intake, investigative files, and case notes), assessments, court documents, placement records, and medical and psychological records, all of which, if

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Jessica Avery
Circuit Court Clerk

they even exist, would be confidential and should not be released to the Defendant in this matter.

4. T.C.A. § 37-1-409 and T.C.A. § 37-1-612 make all reports of child abuse confidential, including an information obtained in receiving or investigating reports of child abuse, and directs that they shall not be disclosed except as specifically authorized by one of several enumerated exemptions.

5. In the present matter none of the enumerated exceptions are applicable and therefore the subpoenas should be quashed.

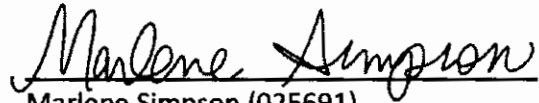
6. If the Court determines that the records may contain portions that Mr. Drummond is entitled to under the law, the proper procedure is an *in camera* review by the Court. In State of Tennessee v. Gwendolyn Hagerman E2011-00233-CCA-R3-CD (Tenn.Crim.App. 2013), the Court concluded that the *in camera* review is an additional mechanism for protecting a defendant's confrontation rights and statutorily protected records.

7. If the Court determines the documents should be produced, the Department requests that the Court enter an order requiring an *in camera* review accompanied by a protective order to address any portions of the file that are subject to disclosure.

NOTICE OF HEARING

You are hereby notified that the above styled matter has been scheduled for hearing on the Motion to Quash or in the Alternative for In Camera Review, on the previously scheduled date of May 1, 2026, at 10:30 a.m. or soon thereafter as counsel may be heard, in the Lake County Circuit Court.

Respectfully submitted,

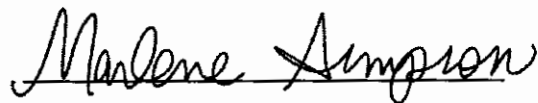


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CERTIFICATE OF SERVICE

I do hereby certify that I have on the 27th day of April 2026 served a copy of the above pleading on the following via email and/or United States Postal Service, postage prepaid, to:

Attorney Bryan Huffman
c/o LeAnna Ferguson; Rylie Edwards
Blackwatch Investigations
296 Washington Avenue
Memphis, TN 38103



cc: DCS Record Custodian