

No. 864928-A

STATE OF TEXAS)	IN THE DISTRICT COURT
V.)	HARRIS COUNTY TEXAS
WILLIAM IRVAN)	180 th JUDICIAL DISTRICT

WRITTEN INTERROGATORIES OF MACK ARNOLD ATTORNEY AT LAW

Please answer the following questions and ultimately swear to the truthfulness of your answers before a notary public.

1. Please state your name and your profession:

2. What is your level of certification by the Judges of Harris County, Texas and the 2nd Administrative Judicial District?

3. When were you appointed to represent William Irvan in the 180th District Court?

4. How many attorney's represented Mr. Irvan at trial, and what was your position in the trial of this case?

5. Were the responsibilities divided up in this case. If so how, if not what was the understanding of each attorney's responsibility.

6. What was your understanding as to why Wayne Hill was relieved from representing Mr. Irvan in this case?

7. Did you ever discuss with Mr. Hill as to why he asked to be removed from further representation of Mr. Irvan? (If so give us the gist of the reason)

8. At any time prior to the trial of this case did Mr. Irvan tell you that he had a consensual sexual relationship going on with Michelle Shadbolt before and at or near the time of her murder?

(Yes) (No) circle one.

9. If the answer to number 8 is yes, what did he tell you?

10. Did you ever talk to or discover any other witnesses who had information concerning any type of a romantic relationship going on between Irvan and Michelle Shadbolt during the time period mentioned in question number 8? If so give their names.

11. Did you or your team talk to George Caldwell before or during the trial of this case? If so what information did he give to you?

12. Why was he not used as a witness in this case, if you know?

13. Did you or your team discuss the relationship issue with a witness by the name of Darlene "Dee Dee" Hughes? If so, what do you remember her saying about the alleged relationship?

14. Were there any other possible witnesses to this relationship between the victim and Mr. Irvan that he gave you names of?

15. At what point, i.e. that is before the trial, or during trial was it decided that the consensual sex defense was not going to be used?

16. Do you remember the basis or reason that the consent defense was not going to be used? If so, what was that reason?