

AFFIDAVIT OF L. WAYNE WOODYARD

STATE OF OKLAHOMA)
)
) ss.
COUNTY OF WASHINGTON)

Mr. L. Wayne Woodyard, a person of lawful age, being duly sworn, under penalty of perjury, do state as follows:

1. I am an attorney licensed by the State of Oklahoma since 1976. From approximately November 2000, I was employed by the Oklahoma Indigent Defense System (OIDS) as a capital trial attorney and appellate attorney assigned to the Sapulpa division until I retired at end of 2016.
2. I was originally assigned as an appellate attorney for the Glossip case. As I recall, the agency had started a policy of assigning appellate attorneys from a different division to sit in on trials to raise issues relevant to the appeal process, but not to investigate and prepare the case for trial.
3. On November 4, 2003, Silas Lyman was appointed as lead counsel to replace Lynn Burch. At that hearing, my role was changed from appellate counsel to second chair specifically to investigate and present any second stage trial that may be necessary. I later was assigned by Mr. Lyman to cross-examine certain first stage witnesses. Mr. Lyman was assigned to handle Mr. Sneed.
4. Though Mr. Sneed was not my assigned witness, to the best of my current recollection, at no time prior to or during trial was I aware that Mr. Sneed had been evaluated by a psychiatrist, had seen a medical doctor for mental health issues while incarcerated or at any other time, had been evaluated by Dr. "Trumpet" or Dr. Lawrence Trombka, or that Mr. Sneed was prescribed lithium due to being diagnosed with bipolar disorder.
5. To the best of my current recollection, I do not recall the State ever disclosing this information to me, verbally or otherwise.
6. Based on my experience and knowledge of the case, this evidence about Mr. Sneed's seeing a psychiatrist and his subsequent mental health diagnosis could have gone to Mr. Sneed's credibility and reliability as a witness. Given the significance of Mr. Sneed's testimony to the State's murder case and death penalty aggravator, I believe this was important information.

7. If the State had disclosed this information to the defense before or during trial, I believe it could have been presented by Mr. Lyman to the jury for them to evaluate as the fact-finder as to the credibility of Mr. Sneed and guilt or innocence of Mr. Glossip.

I swear upon penalty of perjury that the statement in the foregoing two pages is true and accurate to the best of my knowledge and recollection.

Further, Affiant sayeth naught.

L. Wayne Woodyard
L. Wayne Woodyard

State of Oklahoma
County of Washington



Subscribed and sworn to before me on this 12 day of July, 2023.

by L. Wayne Woodyard
Notary: Meredith Scott

My commission expires on April 29, 2027