Exhibit B

STATE OF NORTH CAROLINA

File No. 21-CVS-261

PASQUOTANK County

In The General Court Of Justice
Superior Court Division

IN THE MATTER OF
CUSTODIAL LAW ENFORCEMENT AGENCY
RECORDING SOUGHT BY:

SUPPLEMENTAL AND RENEWED
PETITION FOR RELEASE OF CUSTODIAL LAW ENFORCEMENT AGENCY RECORDING

Name Of Petitioner
PASQUOTANK COUNTY SHERIFF'S OFFICE

Address
200 E. COLONIAL AVENUE

City, State, Zip
ELIZABETH CITY, NC 27909

Phone No.: 252-338-2191
Fax No.: 252-338-1667

Email Address
jleidy@hrem.com

☐ G.S. 132-1.4A(f) – Person authorized to receive disclosure (No Filing Fee Applies)

☒ G.S. 132-1.4A(g) – General (CVS Filing Fee Applies)

I, the above-named petitioner, request the release of a custodial law enforcement agency recording to see Ex. 1 attached hereto state that at least some portion of the law enforcement agency recording was made in this county, and I further state the following: this Petition supplements and renews the Petition filed by this Petitioner in this cause on April 26, 2021, which is incorporated herein by reference, and seeks an order allowing the release of the PCSO recordings made April 21, 2021 that the Court ordered be disclosed by the Amended Order entered in this cause on May 7, 2021 (the "Amended Order", incorporated herein by reference), by which the Court ordered PCSO to disclose to Khalil Ferebee specific portions of the PCSO recordings as described and listed in para. 3 (and specifically parts a. through e. thereto) of the decretal part of the Amended Order (the "Disclosed Recordings"). The Amended Order required that the Disclosed Recordings be blurred to prevent identification pending completion of any internal and criminal investigations. The Amended Order also provided that it did not "prevent reconsideration of release of the videos at a later time, upon the conclusion of both internal and criminal investigations arising from the incidents." The internal and criminal investigations arising from the incidents have now been concluded. Petitioner respectfully seeks an order allowing release of the Disclosed Recordings pursuant to N.C.G.S. 132-1.4A(g), without redaction, at this time.

(Include date and approximate time of activity captured in the recording, or otherwise identify the activity with particularity sufficient to identify the recording at issue.)

CERTIFICATE OF SERVICE ON HEAD OF CUSTODIAL LAW ENFORCEMENT AGENCY

I certify that a filed copy of this Petition was served on the head of the custodial law enforcement agency as follows:

☒ Personal Delivery

☐ By Regular Mail, US postage prepaid, addressed as follows:

Sheriff Tommy Wooten, II
Pasquotank County Sheriff
200 East Colonial Avenue
Elizabeth City, NC 27909

CERTIFICATE OF SERVICE ON DISTRICT ATTORNEY

I certify that a filed copy of this Petition was served on the District Attorney as follows *(only required for general release)*:

☒ Personal Delivery

☐ By Regular Mail, US postage prepaid, addressed as follows:

Andrew Womble
Pasquotank County District Attorney
200 E. Colonial Avenue
Elizabeth City, NC 27909

Date: 05/18/2021

Petitioner's Signature: Tommy S. Wooten II

AOC-CV-270, Rev. 4/17
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EXHIBIT 1

Release to the following is sought pursuant to N.C.G.S. §132-1.4A(g):

1. Khalil Ferebee
2. The General Public

CERTIFICATE OF SERVICE

The undersigned certifies that, on the date shown below, the Special Counsel for Petitioner and County of Pasquotank County sent the foregoing Supplemental and Renewed Petition for Release of Custodial Law Enforcement Agency Recording to the person name below at the address shown below, by electronic service as defined in 26 NCAC 03.0501(4), or by placing a copy thereof, enclosed in a wrapper addressed to the person to be served into an official depository of the United States Postal Services:

Mr. H. P. Williams, Jr.
408 E. Colonial Avenue, Suite B
Elizabeth City, NC 27909
hpw@hpwilliamslaw.com

Michael J. Tadych
Stevens Martin Vaughn & Tadych, PLLC
6300 Creedmoor Road, Suite 170-370
Raleigh, NC 27612
mike@smvt.com

Bob Schurmeier
NCSBI
3320 Garner Road
Raleigh, NC 27610

John Doughtie
Dare County Sheriff
962 Marshall C. Collins Drive
Manteo, NC 27954

Shelby White
Perquimans County Sheriff
110 North Church Street
Hertford, NC 27944

This the 18th day of May, 2021.

John D. Leidy
Hornthal, Riley, Ellis & Maland, L.L.P.
N.C. State Bar No.: 14218
301 E. Main Street
Elizabeth City, NC 27909
Telephone: (252) 335-0871
Email: jleidy@hrem.com
Special Counsel for Petitioner, Sheriff Tommy Wooten, II