[CAPTION]

COMBINED NOTICE OF INSANITY DEFENSE AND HEARING TO DETERMINE COMPETENCE TO STAND TRIAL

The Defendant, [name], by counsel, moves this Court, pursuant to I.C. 35-36-3-1, to appoint two (2) competent, disinterested psychiatrists to examine the Defendant and report to this Court on his competence to stand trial, and for a hearing on said issue. This request is based on undersigned counsel's belief that the Defendant lacks ability to understand the proceedings and assist in the preparation of his defense.

Further, the Defendant by counsel, serves notice, pursuant to I.C. 35-36-2-1, of the intent to raise the defense of insanity at the time of trial in this cause.

WHEREFORE, Defendant by counsel, respectfully moves this Court to appoint two (2) competent psychiatrists to examine the Defendant and report on his competence to stand trial. Further, Defendant requests two (2) psychiatrists be appointed to examine the Defendant as to his sanity or insanity at the time of the alleged offense and these psychiatrists should be prepared to testify at trial in this cause. In the alternative, Defendant requests this court to schedule a competency hearing in order that the two disinterested psychiatrist may be examined regarding the Defendant's competency to stand trial and/or aid in his defense, as well as any other relief just and proper to carry out this motion.

Respectfully submitted,