

2015 DEC 30 P 3:00

STATE OF MARYLAND

* IN THE

Plaintiff

* CIRCUIT COURT

v.

* FOR

CAESAR GOODSON

* BALTIMORE CITY

Defendant

* Case No. 115141032

* * * * *

DEFENDANT'S RESPONSE TO STATE'S MOTION FOR ALTERNATING CHALLENGES AND REQUEST FOR VOIR DIRE

Defendant Caesar Goodson, through his counsel, submits this response to the State's Motion for Alternating Challenges and Request for Voir Dire. Defendant has no objection to the use of alternating challenges. With respect to the State's Request for Voir Dire, to the extent that the State's request refers to the Voir Dire utilized in the trial of *State of Maryland vs. William Porter* (#115141037), no copy of the Voir Dire utilized was provided. To the extent that this response cannot address the requests made, due to lack of a copy of the Voir Dire referenced, Defendant reserves the right to object to the requested Voir Dire.

1. Defendant has no objection to asking the jury in Question 6 if any of them knows or has any relationship with Officer Goodson. (See Defendant's Requested Voir Dire #6.)

2. Defendant has no objection to asking the jury in Question 7 if any of them knows counsel for the Defendant.

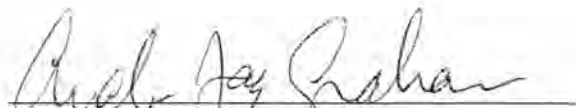
3. Defendant objects to the inclusion, in the Appendix of names of witnesses, of counsel for this Defendant and other individuals, including the first 13 names on the State's suggested Appendix for use with Question 8.

4. Defendant has no objection to the State's Request Number 4 to amend Question 14 (submitted as Question 15 in Defendant's Requested Voir Dire.)

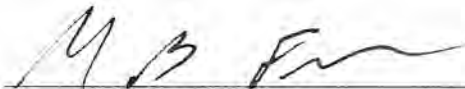
5. Defendant objects to the State's Request Number 5 to strike "Question 16" (Defendant's Requested Voir Dire #17).

6. Defendant has no objection to amending "Question 19" (submitted as Question 18 in Defendant's Requested Voir Dire) to reflect an updated anticipated end date of the trial.

7. Assuming the State's Request Number 7 to refer to Question 72, rather than 27, Defendant objects, as it is not clear how "special knowledge" would differ from "knowledge" in the question as phrased in Defendant's Request #72.



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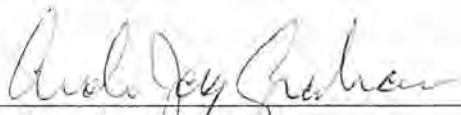
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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December 2015, a copy of the foregoing Response to State's Motion for Alternating Challenges and Request for Voir Dire was sent by first class mail, postage prepaid to:

Michael Schatzow, Chief Deputy State's Attorney
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