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IN THE CIRCUIT COURT FOR BALTIMORE CITY

2015 SEP 21 PM 4:25

STATE OF MARYLAND

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Plaintiff

*

v.

*

Case No. 115141033

EDWARD NERO

*

Defendant

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* * * * *

CIRCUIT COURT
BALTIMORE CITY
CRIMINAL DIVISION

MOTION TO PRODUCE RECORDS REGARDING DNA ANALYSIS

The Defendant, Edward Nero, through his attorney, respectfully requests that this Honorable court order the production of all documents and records which relate to the forensic testing conducted in the above captioned case. In support thereof, Defendant avers the following:

Defendant is charged with second degree assault and related charges.

1. The State has indicated that it intends to introduce the results of DNA testing in the above captioned cases.
2. The DNA analysis is performed with an automated testing system. The automated testing system employs specialized data collection and analysis software.
3. In this DNA analysis system, some information contained in the electronic data files generated during the analysis is not present in the hard copy printouts. Additionally, the testing data is routinely edited by the software program that responds to manual inputs and generates a visual image that differs from that of the original data. This electronic "raw data" is necessary to evaluate the scientific evidence that the State seeks to introduce at trial.
4. Counsel respectfully requests that the State be ordered to produce all records that relate to the DNA testing conducted in the instant case, including, but not limited to the following records:

