

RECEIVED
CLERK OF COURT

STATE OF MARYLAND

2015 NOV 12 P 2:43

v.

WILLIAM PORTER

IN THE
CIRCUIT COURT FOR
BALTIMORE CITY
CASE No. 115141037
(Filed under seal)

* * * * *

MOTION FOR ALTERNATING CHALLENGES AND REQUEST FOR VOIR DIRE

The State of Maryland, by and through Marilyn J. Mosby, the State’s Attorney for Baltimore City; Michael Schatzow, Chief Deputy State’s Attorney for Baltimore City; Janice L. Bledsoe, Deputy State’s Attorney for Baltimore City, hereby requests, pursuant to Rule 4-313, alternating challenges, and, pursuant to Rule 4-312, that this Court examine the jurors of the array using the Voir Dire that the Court provided during the conference with the Parties on November 4, 2015, along with the following modifications and additions:

A. Requested Modifications to the Court’s Voir Dire Provided to the Parties on November 4

The State respectfully requests the following modifications to the Court’s Voir Dire provided to the Parties on November 4:

When listing the names to be identified in Question 6, utilize the attached **Appendix of Witness Names**.

Include language in Question 18 to inquire also about “police misconduct in office” as among the crimes about which jurors might have strong feelings.

Include language at the end of Question 28 that would specify that the contributions referenced in the question include any contributions to the Fraternal Order of the Police.

B. Requested Additions to the Court’s Voir Dire Provided to the Parties on November 4

The State respectfully requests the following additions to the Court’s Voir Dire provided to the Parties on November 4:

Inquire whether any member of the jury panel or a family member has ever been employed by any criminal defense organization, such as the Office of the Public Defender or a law firm that practices criminal defense.

Inquire whether any member of the jury panel has a strongly positive or strongly

negative view about Marilyn Mosby, the State's Attorney for Baltimore City, or about the Office of the State's Attorney for Baltimore City?

Inquire whether any member of the jury panel has a strongly positive or strongly negative view about the Baltimore City Police Department or its officers?

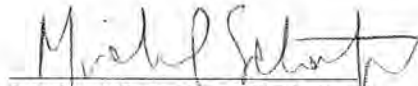
Inquire whether any member of the jury panel would have any difficulty following the court's instruction not to read about, listen to, or watch news coverage about this case if selected as a juror?

Inquire whether any member of the jury panel was personally impacted by any of the unrest connected to the death of Freddie Gray?

Wherefore, the State requests that this Court permit alternating challenges and examine the jurors of the array using the above proposed voir dire, in addition to the Voir Dire provided to the Parties by the Court on November 4, 2015.

Respectfully submitted,

Marilyn J. Mosby



Michael Schatzow (#717876)
Chief Deputy State's Attorney
120 East Baltimore Street
The SunTrust Bank Building
Baltimore, Maryland 21202
(443) 984-6011 (telephone)
(443) 984-6256 (facsimile)
mschatzow@stattorney.org



Janice L. Bledsoe (#68776)
Deputy State's Attorney
120 East Baltimore Street
The SunTrust Bank Building
Baltimore, Maryland 21202
(443) 984-6012 (telephone)
(443) 984-6256 (facsimile)
jbledsoe@stattorney.org

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 2015, a copy of the State's Motion for Alternating Challenges and Request for Voir Dire was mailed and e-mailed to:

Joseph Murtha
Murtha, Psoras & Lanasa, LLC
1301 York Road, Suite 200
Lutherville, Maryland 21093
(410) 583-6969
jmurtha@mpllawyers.com
Attorney for Officer William Porter

Gary Proctor
Gary E. Proctor, LLC
8 E. Mulberry St.
Baltimore, MD 21202
410-444-1500
garyeproctor@gmail.com
Attorney for Officer William Porter

Respectfully submitted,
Marilyn J. Mosby


Janice L. Bledsoe (#68776)
Deputy State's Attorney
120 East Baltimore Street
The SunTrust Bank Building
Baltimore, Maryland 21202
(443) 984-6012 (telephone)
(443) 984-6256 (facsimile)
jbledsoe@stattorney.org

STATE OF MARYLAND

v.

WILLIAM PORTER

* * * * *

*
*
*
*
*
*

IN THE
CIRCUIT COURT FOR
BALTIMORE CITY
CASE No. 115141037
(Filed under seal)

APPENDIX OF WITNESS NAMES

Ivan Bates, Esq.

Tony Garcia, Esq.

Mary Lloyd, Esq.

Matthew B. Frailing, III, Esq.

Catherine Flynn, Esq.

Michael Belsky, Esq.

Chaz Ball, Esq.

Andrew Jay Graham, Esq.

Gary E. Proctor, Esq.

Marc L. Zayon, Esq.

Allison R. Levine, Esq.

Brandon Mead, Esq.

Joseph Murtha, Esq.

Donta Allen

Sgt. Robert Amador

Dr. Matthew D. Ammerman

Ofc. Brandon Avery

Ofc. Sarah Avery

Anthony Batts

Maj. Donald Bauer

Ofc. Arlene Beads

Ofc. John Beamer

Ofc. Saimir Begollari

Ofc. John Bilheimer

Major Stan Brandford

Ofc. Eugene Breen

Ofc. James Briscoe

Devon Brown

Duane Brown

Det. William Boyd

Det. Donald Burns

Det. Edward Burns

Det. John Burns

Det. Robert Burns

Ofc. Anthony Bush

Ofc. Sidney Cutchin

Ofc. Michael DeJesus

Sgt. Kenneth DeLuca

Dr. Vincent J.M. Di Maio

Det. Ryan Diener

Ofc. Garey Dyer

Ofc. Raymond Fields

Dr. David R. Fowler

Det. Joseph Fritzges

Sgt. Tashawna Gaines

Joseph Greely

Darryl Green

Ofc. Eric Green

Col. Garnell Green

Ofc. Tavon Green

Michelle Gross
Sgt. Michael Guzman
Ofc. Jamal Harris
Ofc. Suifan Hassan
Ofc. John Herzog
Sgt. Michael Hobson
Sgt. Jaclyn Hubbard
Ofc. Aaron Jackson
Ofc. Lloyd Johnson
Sgt. Christopher Jones
Sgt. Sean Jones
Sgt. Brian Kratz
Don Lemon
Timothy J. Longo
Det. Michael Lind
Avon Mackel
Ofc. Ryan Magnuson
Asst. Attorney General Michelle Martin
Det. Richard McCarthy
Jayne Miller
Ofc. Keegan Mills
Det. Eugene Molinaro
Ofc. Raymond Morrioni
Ofc. Manolo Munoz
Sgt. Keenan Murphy
William Murphy
Ofc. Valentine Nagovich
Ofc. Jeffrey Nugent
Lt. Christopher Quick
Lt. Robert Quick

Cpt. Erik Pecha
Ofc. Robert Persico
Ofc. Joyce Pinnock
Ofc. Alexandria Popham
Ofc. Brenden Provow
Ofc. Eric Ray
Cpt. Justin Reynolds
Ofc. Gabriel Rimolo
Davonte Roary
Maj. Osborne Robinson
Det. Kevin Roseborough
Ofc. John Rosenblatt
Ofc. Timothy Rueger
John "Jack" Ryan
Michael Schuh
Ofc. Verna Severin
Ofc. Jerome Shaurette
Det. John Socgfack
Sgt. Carl Stambaugh
Det. Daniel Stein
Sgt. Warren Stephens
Ofc. Susan Thomas
Officer Jonathan VanCuran
Det. Valencia Vaughn
Sierra Warren
Wayne Williams
Dr. Michael Woodhouse
Ofc. Sean Yampierre
Sgt. Lewis Yamin
Lt. Jason Yerg

Asst. State's Attorney Albert Peisinger
Asst. State's Attorney Antonio Gioia
Asst. State's Attorney Lisa Goldberg
April Cook
Alex Brooks
Angela Gibson
Eboney Hallman
Devon Scott
Donna Batson
Geraldine McAndrew
Harry Rebstock
Joe Howley
Kenny Whitaker
Kimberly Mondell
Kizzy Carr
Natasha Hill
Phillip Porter
Sylvia Porter
Tyler Wagner
Ikea Whitlock
Terry Whitlock
Nicole Carr
Beverly Howell
Renea Sommerville
William Porter
Helena Porter
Ian Meertens
Jose Bruno
Dr. Carol Allan
Det. Corey Alston

Det. Charles Anderson
Jennifer Anderson
Chief Martin Bartness
Det. Jeff Boettcher
Det. Michael Boyd
Ofc. Alice Carson-Johnson
Virginia Cates
Major Sam Cogan
Det. Alexi Correa
Kiona Craddock
Det. Lakishna DeGraffinried
Ofc. Dan Gillgannon
Major Ian Dombrowski
Det. Alexis Emmanuelli
Det. Bryant Fair
Ofc. Mark Gladhill
Sgt. Christopher Grant
Det. Timothy Hamilton
Angelique Herbert
Thomas Herbert
Lt. Samuel Hood
Jung Hyoun Hwang
James Irons
Det. Christopher Izquierdo
Andrew Jaffee
CSO Vernon Laumann
Det. Osiris Lofton
Dr. Michael Lyman
CSO Thomas Maurer
Kevin Moore

Lt. Michael Norris
Sean Norris
Ofc. Zachary Novak
Rick Opitz
Det. Joseph Poremski
Dr. Mary Ripple
Brandon Ross
Dr. Mark Soriano
Det. Donald Shores
Det. Carl Stambaugh
Det. Dawnyell Taylor
Ofc. April Taylor
Det. Syreeta Teel
Det. Mark Veney
Daquantey Walker
Sam Walters
Shawn Washington
Clt. Thomas Wisner
Ofc. Matthew Wood