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STATE OF MARYLAND

2015 SEP 16 PM 4:06 IN THE
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CIRCUIT COURT FOR
BALTIMORE CITY

V.

WILLIAM PORTER,

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CASE No. 115141037

MOTION FOR SUBPOENA FOR TANGIBLE EVIDENCE

Defendant, William Porter, by undersigned counsel, and hereby file this Motion for Subpoena for Tangible Evidence pursuant to Maryland Rule 4-264 hereby moves this Honorable Court to order the issuance of a *subpoena duces tecum*, commanding the custodian of records for the Office of the State’s Attorney to produce before trial the documents and other tangible evidence that are relevant to the above-captioned criminal proceedings, and in support thereof states:

1. The Defendant is scheduled for trial on October 13, 2015.
2. This case involves the investigation into the death of Freddie Gray on or about April 19, 2015.
3. It is the belief of undersigned counsel that the Office of the State’s Attorney conducted a comprehensive, thorough and independent investigation of the facts and circumstances surrounding this incident.
4. It is the belief of undersigned counsel that the Office of the State’s Attorney worked 12 to 14 hours a day, interviewing dozens of witnesses, and collecting documents and other types of evidence regarding this incident.

