

STATE OF MARYLAND

* IN THE

v.

* CIRCUIT COURT

ALICIA WHITE

* FOR

Defendant.

* BALTIMORE CITY

* CASE NO. 115141036

* * * * *

**DEFENDANT'S RESPONSE TO STATE'S MOTION *IN LIMINE* TO
PRECLUDE DEFENDANT FROM CALLING PROSECUTORS AS
WITNESSES DURING DEFENDANT'S TRIAL AND
REQUEST FOR AN EVIDENTIARY HEARING**

NOW COMES Defendant, Alicia White, by and through her attorneys, Ivan J. Bates, Esquire, Tony N. Garcia, Esquire, Mary M. Lloyd, Esquire, and Bates & Garcia, LLC, and pursuant to Maryland Rules 4-252(d), files this Response to State's Motion in limine to preclude Defendant from Calling Prosecutors as Witnesses during Defendant's trial and Request for a Hearing and in support thereof states the following.

INTRODUCTION

The State seeks *in limine* to preclude Defendant White from calling prosecutors as witnesses based solely on the ground that the questions that the State believes Defendant's counsel will ask would not yield relevant or admissible evidence. In support of its argument, the State posits a number of areas into which it believes Defendant's counsel would inquire and argues why those areas of inquiry may not be relevant or admissible at Defendant White's trial.

The State, *again*, seeks to lead this Honorable Court through a treacherous constitutional minefield unconcerned with whether this Court inadvertently triggers a detonation along the way. The State's exact argument has been squarely rejected by the Court of Appeals as it constitutes, without question, a violation of a Defendant's rights secured by the Sixth and Fourteenth

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