

STATE OF MARYLAND

v.

CAESAR GOODSON

\*  
\*  
\*  
\*  
\*  
\*

IN THE  
CIRCUIT COURT FOR  
BALTIMORE CITY

CASE No. 115141032

\* \* \* \* \*

**STATE'S RESPONSE TO DEFENDANT'S MOTION TO PRODUCE RECORDS  
REGARDING DNA ANALYSIS**

Now comes 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; and Matthew Pillion, Assistant State's Attorney for Baltimore City; and pursuant to Rule 4-263 responds to the Defendant's Motion to Produce Records Regarding DNA Analysis as follows:

1. The Defendant's Motion requests an array of materials related to the DNA analysis conducted in this case, but the Motion cites no authority for either the Motion itself or for any entitlement to the materials therein requested. The Motion, thus, fails to comply with Rule 4-252(e)'s requirement to "contain . . . citation of authorities."

2. The State, however, has construed the Motion, in the alternative, as a request for discovery.

As such, pursuant to Rule 4-263 and *Cole v. State*, 378 Md. 42 (2003), the State responds that:

A. The material the Defendant requests in paragraph (a) of the Motion, to the best of the State's knowledge, was disclosed on June 26, 2015.

B. The material the Defendant requests in paragraph (b) of the Motion, to the best of the State's knowledge, was disclosed on June 26, 2015.

2015 SEP 28 PM 2:09  
RECEIVED  
FELTHERINGTON  
CIRCUIT COURT  
BALTIMORE CITY  
CLERK'S DIVISION

C. The material the Defendant requests in paragraph (c) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

D. The material the Defendant requests in paragraph (d) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

E. The material the Defendant requests in paragraph (e) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

F. The material the Defendant requests in paragraph (f) of the Motion, to the best of the State's knowledge, was disclosed on June 26, 2015.

G. The material the Defendant requests in paragraph (g) of the Motion, to the best of the State's knowledge, was disclosed on June 26, 2015.

H. The material the Defendant requests in paragraph (h) of the Motion, to the best of the State's knowledge, was disclosed on June 26, 2015.

I. The material the Defendant requests in paragraph (i) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

J. The material the Defendant requests in paragraph (j) of the Motion, to the best of the State's knowledge, was disclosed on June 26, 2015.

K. The material the Defendant requests in paragraph (k) of the Motion, to the best of the State's knowledge, was disclosed on September 22, 2015.

L. The material the Defendant requests in paragraph (l) of the Motion, to the best of the State's knowledge, was disclosed on September 22, 2015.

M. The material the Defendant requests in paragraph (m) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

N. The material the Defendant requests in paragraph (n) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

O. The material the Defendant requests in paragraph (o) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.


P. The material the Defendant requests in paragraph (p) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

Q. The material the Defendant requests in paragraph (q) of the Motion, to the best of the State's knowledge, is on file at the Baltimore Bar Library, a disclosure method suggested in *Cole*, 378 Md. at 66, n. 21.

Wherefore, the State requests that this Court deny the Defendant's Motion as either non-compliant with Rule 4-252 or else as moot in light of the State's disclosures.

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](mailto: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](mailto:jbledsoe@stattorney.org)



Matthew Pillion (#653491)  
Assistant State's Attorney  
120 East Baltimore Street  
The SunTrust Bank Building  
Baltimore, Maryland 21202  
(443) 984-6045 (telephone)  
(443) 984-6252 (facsimile)  
[mpillion@stattorney.org](mailto:mpillion@stattorney.org)

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of September, 2015, a copy of the State's Response to the Defendant's Motion to Produce Records Regarding DNA Analysis was delivered to Defendant's counsel as specified below:

By mail and email to: Matthew B. Fraling, III  
Sean Malone  
Harris Jones & Malone, LLC  
2423 Maryland Avenue, Suite 100  
Baltimore, MD 21218  
(410) 366-1500  
[matthew.fraling@mdlobbyist.com](mailto:matthew.fraling@mdlobbyist.com)  
Attorneys for Officer Caesar Goodson

By mail and email to: Andrew Jay Graham  
Kramon & Graham, P.A.  
1 South Street, Suite 2600  
Baltimore, MD 21202  
410-752-6030  
[AGraham@kg-law.com](mailto:AGraham@kg-law.com)  
Attorney for Officer Caesar Goodson

By mail and email to: Catherine Flynn  
Mead, Flynn & Gray, P.A.  
One North Charles Street, Suite 2470  
Baltimore, MD 21201  
(410) 727-6400  
[cflynn@meadandflynn.com](mailto:cflynn@meadandflynn.com)  
Attorney for Officer Garrett Miller

By mail and email to: Marc L. Zayon  
Roland Walker & Marc L. Zayon, P.A.  
201 N. Charles Street, Suite 1700  
Baltimore, Maryland 21201  
(410) 727-3710  
[mzayon@walkerzayon.com](mailto:mzayon@walkerzayon.com)  
Attorney for Officer Edward Nero

By mail and email to: Joseph Murtha  
Murtha, Psoras & Lanasa, LLC  
1301 York Road, Suite 200  
Lutherville, Maryland 21093  
(410) 583-6969  
[jmurtha@mpllawyers.com](mailto:jmurtha@mpllawyers.com)  
Attorney for Officer William Porter


By mail and email to: Gary Proctor  
Gary E. Proctor, LLC  
8 E. Mulberry St.  
Baltimore, MD 21202  
410-444-1500  
[garyeproctor@gmail.com](mailto:garyeproctor@gmail.com)  
Attorney for Officer William Porter

By mail and email to: Michael Belsky  
Chaz Ball  
Schlachman, Belsky & Weiner, P.A.  
300 East Lombard Street, Suite 1100  
Baltimore, MD 21202  
(410) 497-8433  
[mbelsky@sbwlaw.com](mailto:mbelsky@sbwlaw.com)  
Attorney for Lieutenant Brian Rice

By mail and email to: Ivan Bates  
Tony Garcia  
201 N. Charles Street, Suite 1900  
Baltimore, Maryland 21201  
(410) 814-4600  
[ivan@batesgarcia.com](mailto:ivan@batesgarcia.com)  
Attorney for Sergeant Alicia White

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](mailto:jbledsoe@stattorney.org)