

2015 DEC 21 P 3:18

STATE OF MARYLAND

IN THE
CIRCUIT COURT FOR
BALTIMORE CITY

v.

CAESAR GOODSON

CASE No. 115141032

* * * * *

**STATE'S PETITION TO SECURE THE ATTENDANCE OF PRISONER WITNESS
FROM THE COMMONWEALTH OF PENNSYLVANIA TO TESTIFY IN THE STATE
OF MARYLAND PURSUANT TO MARYLAND COURTS AND JUDICIAL
PROCEEDINGS §9-303 TO COMPLY WITH PENNSYLVANIA STATUTES ANN. 42
PA.C.S.§5971-79**

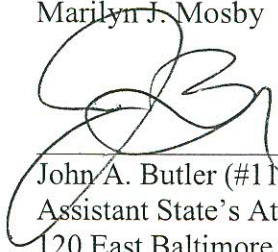
Now comes Marilyn J. Mosby, State's Attorney for Baltimore City, and John A. Butler, Assistant State's Attorney for Baltimore City, who petition this Honorable Court pursuant to Maryland Courts and Judicial Proceedings Code Ann. §9-303 to comply with the provisions of the Pennsylvania Statutes Ann. 42 Pa.C.S.§5971-79 and states the following:

1. The Office of the State's Attorney for Baltimore City is commencing criminal proceedings on January 6, 2016, in the Circuit Court for Baltimore City against Caesar Goodson, who stands charges for involuntary manslaughter and related charges.
2. At the request of the Defense, the Office of the State's Attorney for Baltimore City has been ordered by the Court to seek the attendance of Donta Allen, inmate number 213834 who is currently incarcerated in the York County Prison and who is an essential material witness to an event which is part of the basis for the Defense's case in the above-captioned matter.
3. Donta Allen is currently incarcerated at York County Prison, 3400 Concord Road, York, Pennsylvania, 17404.
4. The trial in the above-captioned case is scheduled for Wednesday, January 6, 2016 and is expected to be completed by January 22, 2016. We anticipate Donta Allen testifying on or around January 19, 2015. The Baltimore City Police Department would like to transport Donta Allen on January 3, 2016, due to heavy security protocol during the above captioned trial.
5. The Baltimore City Police Department will be responsible for transporting Donta Allen from York County Prison, housing him in the Howard County Detention Center, 7301 Waterloo Rd., Jessup, MD 20794, and transporting him back to York County Prison in Pennsylvania, and the State of Pennsylvania will not be responsible for any related costs.

WHEREFORE, the undersigned requests this honorable Court to issue a Certificate under the Seal of the Court stating that Donta Allen is a material witness and Order that the Certificate may be presented to the York County Office of the District Attorney for the purpose of securing the appropriate process of that jurisdiction to compel the above-named witness to be transported from York County Prison to the Howard County Detention Center by the Baltimore City Police Department and to be transported from the Howard County Detention Center to the Baltimore City Circuit Courthouse for trial scheduled for Wednesday, January 6, 2016 and expected to be completed by Friday, January 22, 2016, pursuant to Md. Courts and Judicial Proceedings Code Ann. §9-303 to comply with the provisions of the Pennsylvania Statutes Ann. 42 Pa.C.S. §5971-79.

Respectfully submitted,

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