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BALTIMORE CITY
CRIMINAL DIVISION

STATE OF MARYLAND

Plaintiff

v.

GARRETT MILLER

Defendant

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
* Case No. 115141034

* * * * *

DEFENDANT MILLER'S MOTION TO SHORTEN TIME FOR THE STATE TO
RESPOND TO DEFENDANT'S SUPPLEMENTAL MOTION FOR KASTIGAR
HEARING

Defendant Officer Garrett Miller, by and through his attorneys, Catherine Flynn and Brandon Mead, pursuant to Maryland Rule 1-204, hereby move this Honorable Court for an order shortening the time in which the State has to respond to his Supplemental Motion for a Kastigar Hearing and in support thereof states the following:

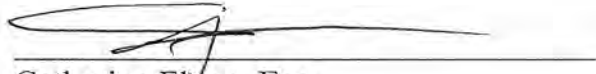
1. Contemporaneous with this motion, the above Defendant has filed a Supplemental Motion for a Kastigar Hearing.
2. Normally, pursuant to the Maryland Rule 4-252(f), the State would be allowed fifteen (15) days from the date they were served with the Motion to respond to same. In this case, however, time is of the essence. This matter is scheduled for trial on Wednesday, July 27, 2016. If the customary fifteen (15) days were observed, the State's response would be due on or around August 1, 2016, which falls after the scheduled trial date.
3. In light of the above, Defendant respectfully requests that the State be given five (5) days from the date the State is served with the Motion to file a response.
4. The Defendant's motion is a reasonable request under the circumstances and in

light of the impending trial date.

WHEREFORE, Defendant Garrett Miller respectfully requests that this Honorable Court:

- A. Grant Defendant's Motion to Shorten Time;
- B. Issue an Order requiring the State to file a Response to Defendant's Motion within five (5) days of the date the State is served with the Motion; and
- C. Grant such further relief as this Court deems necessary under the facts and circumstances of this case.

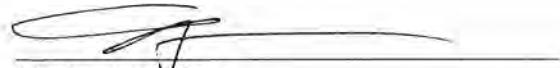
Respectfully submitted,



Catherine Flynn, Esq.
Brandon Mead, Esq.
MEAD, FLYNN & GRAY, P.A.
1 N. Charles Street, Suite 2470
Baltimore, Maryland 21201
Phone: (410) 727-6400

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of July, 2016 a copy of the foregoing Motion was hand-delivered to the Office of the State's Attorney for Baltimore City, 120 East Baltimore Street, Baltimore, Maryland 21202.


Catherine Flynn

STATE OF MARYLAND

Plaintiff

v.

GARRETT MILLER

Defendant

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IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

Case No. 115141034

* * * * *

ORDER

HAVING CONSIDERED, Defendant's Motion to Shorten Time for the State to Respond to Defendant's Supplemental Motion for Kastigar Hearing, it is this _____ day of _____, 2016, hereby:

ORDERED, that Defendant's Motion to Shorten Time be and it is hereby GRANTED; and it is further:

ORDERED, that the State respond to Defendant's Motion within five (5) days of the date that the State is served with the Motion.

Judge, Circuit Court of Maryland for Baltimore City