

RECEIVED

STATE OF MARYLAND

* IN THE

2015 NOV 17 PM 2:01

v.

* CIRCUIT COURT

CIRCUIT COURT
BALTIMORE CITY
CRIMINAL DIVISION

WILLIAM PORTER,

* FOR

Defendant.

* BALTIMORE CITY

* Case Nos.: 115141037

* * * * *

**DEFENDANT'S RESPONSE TO STATE'S MOTION IN LIMINE TO LIMIT THE
NUMBER AND TESTIMONY OF THE DEFENDANT'S PROPOSED
CHARACTER WITNESSES**


Now comes the defendant, William Porter, by and through undersigned counsel, and in response to the State's Motion in Limine to Limit the Number and Testimony of the Defendant's Proposed Character Witnesses, states the following:

1. The defendant has clearly, succinctly and logically set forth in a previously filed Memorandum in Support of Admissibility of Character Evidence the legal basis for the admissibility of character witness evidence in this matter. The defendant adopts and incorporates by reference that document in support of his objection to the State's argument that certain character evidence is not admissible in the trial of this matter.


2. The State's objection to the number of character witnesses to be called during the course of the trial in this matter is a premature, and unfounded at this time. As the State is aware, the defendant was required pursuant to Maryland Rule 4-263(e)(3) to provide the name of each potential character witness. Failure to identify an individual as a potential witness would certainly have resulted in the State's swift objection to calling a person not previously disclosed by the defense. As such, the State's objection is not ripe, and need not be addressed by

either the defendant, nor the Court.

Respectfully submitted,



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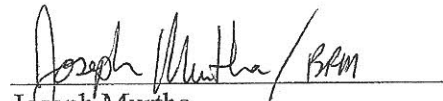


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Attorney for Defendant
William Porter

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of November, 2015 a copy of the foregoing Defendant's Response to the State's Motion in Limine to the Number and Testimony of the Defendant's Proposed Character Witnesses was hand delivered to the Office of the State's Attorney for Baltimore City, 120 E. Baltimore Street, 9th Floor, Baltimore, Maryland 21202.



Joseph Murtha

JM10139