

STATE OF MARYLAND

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CIRCUIT COURT

v.

BALTIMORE CITY
FOR CRIMINAL DIVISION

WILLIAM PORTER
Defendant

BALTIMORE CITY

CASE NO(s): 115141037

* * * * *

MOTION FOR SUBPOENA FOR TANGIBLE EVIDENCE

Now comes the Defendants, William Porter, by and through his attorneys Joseph Murtha and Gary Proctor, and hereby files this Motion for Subpoena for Tangible Evidence pursuant to Maryland Rule 4-264 hereby moves this Honorable Court to order the issuance of a *subpoena duces tecum*, commanding the custodian of records for the University of Maryland Medical Center to produce before trial the documents and other tangible evidence that is relevant to the above-captioned criminal proceedings, and in support thereof states:

1. The Defendant is scheduled for trial on November 30, 2015.
2. This case involves the investigation into the death of Freddie Gray on or about April 19, 2015.
3. It is the belief of undersigned counsel that the information from the University of Maryland Medical Center will be relevant and necessary to the defense in this case.

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

