

STATE OF MARYLAND

Plaintiff

v.

ALICIA WHITE

Defendant

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IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

Case No. 115141036

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**DEFENDANT'S RESPONSE TO STATE'S MOTION FOR ALTERNATING
CHALLENGES AND REQUEST FOR VOIR DIRE**

CRIMINAL DIVISION

2016 FEB - 11 P 2:29

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CIRCUIT COURT FOR
BALTIMORE CITY

Defendant Alicia White, through her counsel, submits this response to the State's Motion for Alternating Challenges and Request for Voir Dire. Defendant has no objection to the use of alternating challenges. With respect to the State's Request for Voir Dire, to the extent that the State's request refers to the Voir Dire utilized in the trial of *State of Maryland vs. Caesar Goodson* (#115141032) the Defendant has the following response

1. Defendant has no objection to amending Questions 3, 6, 7 and 14 to reflect the charges and attorneys involved in this case.

2. Defendant has no objection to amending Question 38 to read, "[d]o you have any knowledge about the cases involving Officer William Porter or Officer Caesar Goodson? However, the Defendant would request to include in this question the cases involving Office Nero, Lt. Rice and Officer Miller as well.

3. Defendant objects to the inclusion, in Appendix 2 of names of witnesses, of counsel for this Defendant and other co-Defendants, including the first 11 names on the State's suggested Appendix for use with Question 8. The Defendant also objects to the

inclusion, in Appendix 1 of the names of the following witnesses numbered; 95, 119, 120 and Appendix 2 of the names of the following witnesses numbered; 28-52, 68-73 as these witnesses have not been previously disclosed by the State.

4. Defendant requests for the inclusion of the following names as they have been named as witnesses in either the Defendants or the State's disclosures of witnesses;

Det. Edward Bailey

Jamal Baker

Cynthia Banks

Det. Jeff Boettcher

Maj. Kim Burress

Ofc. Mark Butler

Capt. Martinez Davenport

Sgt. Scott Dressler

Raymond Fields

Stacy Lyles- Foster

Neil Franklin

Trevon Green

Sharon Griffin

Col. Melissa Hyatt

Aaron Jackson

Maj. Latonya Lewis

Dr. Joseph C. McGowan

Sgt. Mileta

Stanford O'Neil Franklin

Ofc. Eric Ray

Michael Schatzow

Carolyn Scruggs

Ofc. Dennis Smith
Lloyd C. Sobboh
Shelia Solomon
Robert C. Stokes
Ofc. Monica Veney
Det. Chris Wade
Clt. Thomas Wisner

5. Defendant requests that Question 10 be changed to say "Would any member of the jury panel be inclined to give either more or less weight to the testimony of a defense simply because they are a defense witness or state witness simply because they are a state witness?"

6. Defendant requests that the date addressed in Question 18 be no earlier than fifteen days after February 8, 2016 or whatever day the trial is rescheduled to start.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ivan J. Bates', is written over a horizontal line.

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Counsel for Sergeant Alicia White

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February 2016, a copy of the foregoing
Response to State's Motion for Alternating Challenges and Request for Voir Dire was
sent by first class mail, postage prepaid to:

Michael Schatzow, Chief Deputy State's Attorney
Office of the State's Attorney for Baltimore City
120 East Baltimore Street
Baltimore, Maryland 21202



Ivan J. Bates