

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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CIRCUIT COURT FOR
BALTIMORE CITY
2016 FEB - 1 P 2:29
CRIMINAL DIVISION

**DEFENDANT'S RESPONSE TO STATE'S MOTION IN LIMINE TO
PRECLUDE EVIDENCE CONTAINED IN EXHIBIT 11 OF THE DEFENDANT'S
DISCOVERY DISCLOSURES**

Defendant Alicia White, through her counsel, submits this Response to the State's Motion in Limine to Preclude Evidence Contained in Exhibit 11 of the Defendant's Discovery Disclosures; and states in support of the following:

1. On January 8, 2016, the Defendant provided the State Defendant's Disclosures specifically including Exhibit 11 of her Discovery disclosures, a CD containing a 26 video of a demonstration of a subject who is handcuffed and placed inside a police transport van. The video depicts a handcuffed subject taking off his seatbelt while still in handcuffs. On January 14, 2016, defense counsel was contacted by the State that CD was blank and requested an additional copy of the CD as well as information regarding what was on the CD. Defense counsel replied on the same date that the CD contained "a video demonstration of a passenger in a police transport vehicle unbuckling his seatbelt" and informed the State that an additional copy of the video would be sent via email as soon as possible. A copy of the video was sent via dropbox link on January 14, 2016 with a follow up email requesting

