

State of Maryland * In The
 Vs. * Circuit Court
 Adnan Syed * of
 No. 199103042-46 * Baltimore City

AMENDED STATE'S DISCLOSURE

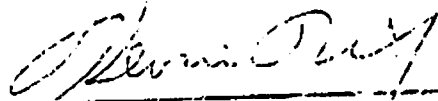
NOW come Patricia C. Jessamy, State's Attorney for Baltimore City, and Kevin Urick, Assistant State's Attorney, and in accordance with provisions of Rule 4-263(h) of the Maryland Rules of Procedure hereby promptly supplement the State's prior disclosure with the following additional witnesses and/or information:

In response to defendant's discovery requests of October 29, and November 8, the State responds:

- 1) The State never said the defense had received the results of a serology test by July 1, 1999;
- 2) To date the only report the State has received from Melissa Stangroom, Forensic Chemist II, of the Maryland State Police Crime Lab is an oral report. On November 8 she informed the State that the last probe for her DNA testing should be developed by November 9, and that all formal discovery should be available on or about November 15, 1999;
- 3) The State erred in its Amended Disclosure of September 3, 1999 when it said a report was being prepared concerning an interview conducted with the defendant;

in fact that report concerned an interview with a different witness;

- 4) All required discovery concerning statements made by or interviews conducted with the defendant has been made.

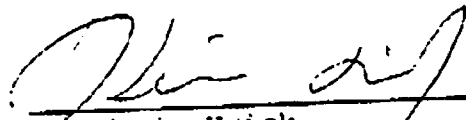


ASA Kevin Urick

Certificate of Service

I HEREBY CERTIFY that on this 5th day of November, 1999, a copy of the foregoing State's Supplemental Disclosure was:

- Served on the Defendant,
- Served on the Defendant's Counsel;
- Mailed to the Defendant;
- Mailed to the Defendant's Counsel.



ASA Kevin Urick

REDMOND, BURGIN & GUTIERREZ, P.A.

ATTORNEYS AT LAW
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M. CRISTINA GUTIERREZ

* Also admitted in the District of Columbia

October 29, 1999

VIA FACSIMILE, 410.727.5437
and FIRST CLASS MAIL

Kevin Urick, Esq.
Office of the State's Attorney
for Baltimore City
Mitchell Courthouse
100 N. Calvert Street, Room 303
Baltimore, MD 21202

RE: *State of Maryland v. Adnan Syed*
Case no. 199103042-46

Dear Mr. Urick:

We have received numerous disclosures concerning serology and/or genetic testing done with regard to the above referenced case. At the October 18th administrative hearing before Judge Mitchell, you stated that we were supplied with the results of a serology test done on the striped shirt found in Ms. Lee's vehicle by July 1, 1999. After reviewing our discovery materials, however, it is clear that the first information we were supplied with concerning testing of the blood evidence on the shirt came in an Amended Disclosure dated **September 3, 1999**. The report itself, by Salvatore J. Bianca, is dated **August 31, 1999**. We received no reports concerning serology on, near, or by July 1st. Please forward immediately the report you were referring to as we have never received it.

Additionally, please provide any and all information concerning serology work or any type of test, analysis, classification or examination of any biological evidence done by the Baltimore City Police Department Crime Laboratory or the Maryland State Crime Lab, including but not limited to: bench notes, worksheets, reports, or any other materials generated during the course of any testing, analysis, classification, or examination. Also, please provide specific information as to what preliminary and confirmatory tests were done on every piece of biological evidence, when they were completed, and by whom.

Pursuant to *Maryland Rule 10-915*, please provide the following material with respect to any DNA testing done in this case:

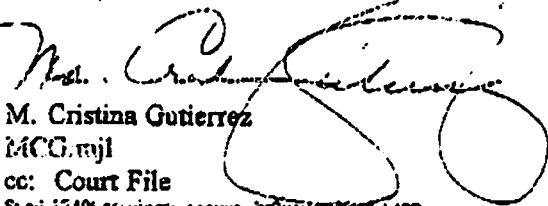
1. Identity of any and all tests conducted on any biological evidence.

Kevin Urick, Esq.
Office of the State's Attorney
October 29, 1999
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2. All written or oral reports as to any information regarding any testing, analysis, or examinations.
3. The names of all persons involved in any testing, analysis, or examinations.
4. First generation film copy or suitable reproductions of any autoradiographs, dot blots, slot blots, silver stained gels, test strips, control strips, and any other results generated in the course of the analysis.
5. Copies of all laboratory notes generated in connection with the analysis, including chain of custody documents, sizing and hybridization information, statistical calculations, and worksheets.
6. Laboratory protocols and procedures utilized in the analysis.
7. The identification of each genetic locus analyzed.
8. A statement setting forth the genotype data and the profile frequency for the databases utilized.

All of the requested information, including the identity of all experts, scientists, or individuals involved with scientific testing in any way, is required for any evaluation by a defense expert. Your immediate attention to this request would therefore be appreciated.

Sincerely,



M. Cristina Gutierrez
MCG:mjl
cc: Court File
Sysid 1740t.99.0109y .1402t.1r2077.82-95-03.1402

REDMOND & GUTIERREZ, P.A.

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FACSIMILE TRANSMITTAL SHEET

DATE: 11.22.99

TO: David Clark, Esq.

FROM: M. Cristina Gutierrez

FAX: 410.727.5437

File No. _____

RE: State v. Syed

By: _____

Hard Copy to Follow: Yes No

Comments: _____

Should you have any questions regarding this transmittal, please call _____

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Should you have any questions relating to this transmittal, please contact me at (410) 752-1555.

formal/general/faxcover.rtf

TRANSMISSION VERIFICATION REPORT

TIME : 10/29/1999 17:08
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FAX : 4107521064
TEL. : 4107521555

DATE, TIME	10/29 17:06
FAX NO./NAME	4107275437
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RESULT	OK
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