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July 7, 1999

via FACSIMILE

CORRECTED ORIGINAL

The Honorable William D. Quarles
Circuit Court for Baltimore City
Mitchell Courthouse
100 N. Calvert Street
Baltimore, MD, 21202

Re: *State v. Adnan Syed*

Dear Judge Quarles:

Pursuant to your instruction at the motions hearing in the above referenced matter on July 2, 1999, I have reviewed the discovery materials provided by the State. The materials provided by Assistant State's Attorney Kevin Urick are deficient in several respects. The following documents were missing and/or not legible as produced by the State:

1. Any and all sketches, diagrams, and photographs of the crime scene, to include the victim as well as any evidence collected.
2. A legible crime scene log. The log provided was cut-off.
3. An evidence log from the crime scene which lists all evidence collected, by whom it was collected, a complete chain of custody list for each piece of evidence, an indication of who, if anyone, performed any analysis testing, etc., an indication of what, if any, analysis or testing was performed, all documents, photographs, and reports regarding each piece of evidence, whether by police officers, testing personnel, or others, and an identification of the custody, location and condition of each and every piece of evidence observed.
4. An evidence log on the alleged victim's car indicating how, when and where car was located, when the car last seen, a listing of all evidence collected, by whom collected, an identification of who, if anyone, performed any analysis testing, etc., an identification of what, if any, analysis or testing was performed, all documents, photographs, and reports, concerning

each piece of evidence, whether written by police officers, testing personnel or others, an identification of the custody, location, and condition of each and every piece of evidence observed and collected.

5. An evidence log on the defendant's car indicating how, when and where car was located, and seized, a listing of all evidence collected, by whom collected, an identification of who, if anyone, performed any analysis testing, etc., an identification of what, if any, analysis or testing was performed, all documents, photographs, and reports, concerning each piece of evidence, whether written by police officers, testing personnel or others, and an identification of the custody, location, and condition of each and every piece of evidence observed and collected.

6. An evidence log on the search of defendant's home and a listing of all evidence collected, by whom collected, an identification of who, if anyone, performed any analysis testing, etc., an identification of what, if any, analysis or testing was performed, all documents, photographs, and reports, concerning each piece of evidence, whether written by police officers, testing personnel or others, and an identification of the custody, location, and condition of each and every piece of evidence observed and collected.

7. All police reports, only incomplete reports were provided.

8. A copy of Det. Bradshaw's follow-up investigation report. The report in the materials provided is cut-off.

9. A copy of the latent fingerprint report for the hockey and lacrosse sticks submitted by Det. Macgillivray. (Property # 99009003). The report as received by the defense is cut-off.

8. Fingerprint results for any other pieces of evidence that were tested in connection with this case.

9. A full copy of all Laboratory Continuation Sheets. The sheets received are illegible and/or cut-off.

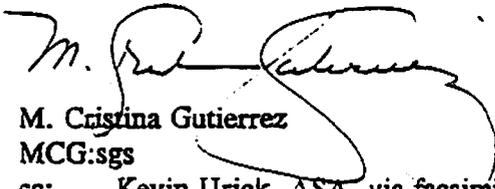
10. A copy of any statements made by Jay Wilds as an unindicted co-conspirator or co-defendant.

The Honorable William D. Quarles
Circuit Court for Baltimore City
July 7, 1999
Page 3

11. A copy of any report or documents prepared by Dr. Rodriguez, the forensic scientist at the crime scene.
12. The missing persons investigatory file, including all reports, photographs taken, witness interviews, etc., specifically, information regarding when and where alleged victim was last seen.
13. A complete witness list. It is clear from the material that numerous forensic witnesses will be called regarding numerous items of evidence listed. No expert witnesses are listed in the witness list.
14. Autopsy photographs. The photocopies provided are not legible.
15. All information regarding when alleged victim was killed. Defendant can't possibly mount a defense or determine if an alibi disclosure is needed without being on notice of the alleged time of death.
16. The Medical Examiner's log with any and all notes made by any personnel concerning the collection of the body.
17. All oral reports from any expert.
18. A list of Evidence for use at trial or any tangible thing the state intends to use.
19. A list of Defendant's property seized at any time or obtained.

The defense respectfully requests that the above mentioned documents be turned over immediately.

Sincerely,



M. Cristina Gutierrez
MCG:sgs

cc: Kevin Urick, ASA, via facsimile (410.727.5437
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