

**IN THE CIRCUIT COURT  
FOR BALTIMORE CITY, MARYLAND**

ADNAN SYED,  
Petitioner,

v.

STATE OF MARYLAND,  
Respondent

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Petition No. 10432  
Original Case Nos. 199103042-46

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**AFFIDAVIT OF GERALD R. GRANT JR.**

I, Gerald R. Grant Jr., hereby affirm under penalty of perjury that the following is true and accurate to the best of my knowledge and recollection:

1. I am a national expert in historical cell site analysis. I have worked on over 100 cases involving historical cell site analysis, and have been admitted as an expert on this topic in approximately 6 jurisdictions.
2. My C.V. is attached to this affidavit.
3. I work with Barry Scheck, Seth Miller and other members of the Innocence Network on historical cell site analysis. In that capacity as a consultant for the Innocence Network, I was asked by C. Justin Brown to review the cellular tower evidence that was used at trial in *State v. Adnan Syed* (captioned above).
4. I have reviewed the CONSOLIDATED RESPONSE IN OPPOSITION TO PETITIONER'S MOTION AND SUPPLEMENT TO REOPEN POST-CONVICTION PROCEEDINGS the State filed, as well as other documents associated with case. I have also spoken on the phone with the State's cell phone expert from trial, Abraham Waranowitz.

5. The AT&T fax cover sheet at issue in this case uses the term "location status," as well as the individual word "location" when stating the disclaimer for incoming calls.
6. In my experience working with many historical cell site analysis cases, major cell phone companies, and other experts in the field, these terms as well as others involving the word "location" have referred to identifying the approximate physical location of the cell phone/handset.
7. Cellular systems consist of multiple components in order to work:
  - Mobile Station (Cell phone/Handset)*
  - Antenna/Transponder*
  - Base Transceiver Station (Cell Tower/Sectors)*
  - Base Station Controller (Handles multiple Cell Towers)*
  - Mobile Switching Center (Handles multiple Base Station Controllers)*
8. Each of these individual items mentioned above play a specific roll when making or receiving a call on a cell phone. They are all associated with determining the approximate location of a cell phone/handset when performing historical cell site analysis. If information is not accurate from any of the components mentioned above, the estimated location of the cell phone/handset cannot be relied upon.
9. Individual documents, containing the detailed call activity that were provided by AT&T, appear to be Subscriber Activity Reports in different formats. Even though some of these documents were submitted as exhibits in incomplete form, the disclaimer on the fax cover sheet should apply to them.
10. I am willing to testify in court as to the use of the cell tower location evidence in this case.

  
Gerald R. Grant Jr.

10/12/2015  
Date