

1 THE COURT: Anything further, Mr. Urick?  
2 MR. URICK: No, thank you.  
3 THE COURT: And may this witness be excused?  
4 MR. URICK: Yes.  
5 THE COURT: Ms. Gutierrez.  
6 MS. GUTIERREZ: Yes.  
7 THE COURT: And released from the summons?  
8 MS. GUTIERREZ: Yes.  
9 THE COURT: Officer, you are now excused. I  
10 want to remind you that you are a sequestered witness.  
11 However, in light of the fact that you have been excused  
12 from the subpoena, you will be permitted to remain in the  
13 courtroom should you choose to do so, or you do not have  
14 to. At this point, you are released from your obligation  
15 to appear in this case.  
16 THE WITNESS: Thank you, Your Honor.  
17 THE COURT: And you may go.  
18 THE WITNESS: Thank you.  
19 THE COURT: Your next witness.  
20 MS. MURPHY: Thank you, Your Honor. At this  
21 time, the State calls Ms. Sharon Talmadge.  
22 (Brief pause.)  
23 THE COURT: Ms. Talmadge, you may rest your  
24 belongings there on that chair next to you, if you would  
25 like. I need you to raise your right hand and listen to

1 Mr. White as he provides the oath.

2 SHARON TALMADGE

3 a witness produced on call of the State, having first  
4 been duly sworn according to law, was examined and  
5 testified as follows:

6 THE CLERK: You may be seated. Please keep  
7 your voice up and state your name and your assignment for  
8 the record.

9 THE WITNESS: Sharon Talmadge. I'm in the  
10 Latent Print Unit for the Baltimore Police Department.

11 THE CLERK: Thank you.

12 DIRECT EXAMINATION

13 BY MS. MURPHY:

14 Q Ms. Talmadge, can you please explain to the  
15 ladies and gentlemen what your duties are in the Latent  
16 Print Unit?

17 A First of all, I supervise approximately thirty-  
18 six people. I evaluate partial latent prints to  
19 determine if they are suitable for comparison. I then  
20 compare suitable partial latent prints to the prints of  
21 victims, suspects or defendants. I process physical  
22 evidence to determine if there are any partial latent  
23 prints on that particular piece of evidence. I maintain  
24 the unit statistics, the unit budget. I prepare reports  
25 in reference to my examinations. I testify in court. I

1 also prepare and present lectures to various people.

2 Q Do you also, as part of your duties, provide  
3 technical assistance to the Office of the Medical  
4 Examiner?

5 A I render technical assistance to the Office of  
6 the Medical Examiner when it is needed and also at crime  
7 scenes.

8 Q What sort of training and experience do you  
9 have in order to perform these duties?

10 A I was trained by the Federal Bureau of  
11 Investigation in the identification field. I was  
12 employed by them as a Fingerprint Technician for  
13 approximately two years. After leaving there, I came to  
14 the Baltimore Police Department and was hired as a  
15 Fingerprint Technician. I also received a three-month  
16 classroom conducted by the Federal Bureau of  
17 Investigation and three months of practical experience  
18 provided by the Federal Bureau of Investigation. I  
19 attend seminars twice a year to keep abreast of new  
20 techniques in the field.

21 Q Approximately how many prints do you think you  
22 have examined in your career with the Baltimore City  
23 Police Department?

24 A It would be in the hundreds of thousands.

25 Q Have you ever testified as an expert in Circuit

1 Court, District Court, Federal Court?

2 A Yes, I have testified numerous times in each of  
3 those courts.

4 MS. MURPHY: Your Honor, at this time the State  
5 would offer Ms. Talmadge as an expert in the development,  
6 examination and identification of both latent and inked  
7 prints.

8 THE COURT: Any objection?

9 MS. GUTIERREZ: No, Your Honor. We would have  
10 already stipulated to her qualifications.

11 THE COURT: All right. Let this witness be  
12 accepted as an expert in the development, examination and  
13 identification of fingerprints.

14 You may proceed.

15 MS. MURPHY: Thank you, Your Honor.

16 BY MS. MURPHY:

17 Q Ms. Talmadge, can you please tell the jury,  
18 what is an inked print?

19 A An inked print is the reproduction of the ridge  
20 detail that is found on your fingers, your palms, the  
21 soles of your feet, and it's made by placing a thin film  
22 of printer's ink on the area and then rolling that area  
23 on a contrasting background.

24 Q What is a latent print?

25 A A latent print is the reproduction of the ridge

1 detail in the same areas that I mentioned, only it is  
2 left behind in oils and perspiration and at times in a  
3 foreign matter on the object when you touch the object.

4 Q What are the methods used to process these  
5 prints?

6 A If you have a porous surface such as paper,  
7 cardboard boxes, raw unfinished wood, you would use a  
8 chemical. The chemical that we use is ninhydrin, and  
9 that reacts to the amino acids that are left behind in  
10 the perspiration. If it's a hard smooth surface that is  
11 a non-porous surface, which means that the print will not  
12 be absorbed into that surface, it remains on the top,  
13 most of the time we use a zephyr brush and graphite  
14 powder to process those types of surfaces.

15 Q What sort of factors affect whether a print is  
16 left on a particular surface?

17 A First of all, you do have to have a pretty good  
18 surface. It has to be relatively smooth and clean and a  
19 hard surface to use the zephyr brush on. The condition  
20 of the hands, you have to have enough oil and  
21 perspiration to leave on the object so that you can leave  
22 a print. Naturally, if you are wearing gloves, you are  
23 not going to leave a print. The method or manner in  
24 which something is touched can destroy a latent print  
25 that would be left on a surface. For instance, a door

1 handle, I can touch the door handle, open it, and then  
2 someone comes behind me and touches it, and when they are  
3 turning it, they could be destroying the prints that were  
4 put on there previously.

5 Q Did you have reason around the time of February  
6 10th to respond to the Office of the Medical Examiner?  
7 This would be 1999.

8 A I did respond to the Medical Examiner.

9 Q What was the purpose for you going there that  
10 day?

11 A To attempt to obtain fingerprints and  
12 palmprints if possible from a person that was  
13 unidentified.

14 Q Could you please describe what you saw there,  
15 the condition of the body that you were asked to  
16 identify?

17 A There was a young lady with long black hair and  
18 she had already been autopsied and her hands were rather  
19 decomposed.

20 Q If you know, why was the autopsy done before  
21 the identification?

22 A Normally the autopsy is done before we try to  
23 get inked prints from the fingers so that we don't  
24 destroy any evidence that might be on the hands or  
25 underneath the fingernails.

1 MS. MURPHY: May I approach the witness, Your  
2 Honor?

3 THE COURT: Yes, you may.

4 (State's Exhibit No. 3(a)  
5 was marked for purposes  
6 of identification.)

7 BY MS. MURPHY:

8 Q Ms. Talmadge, I'm showing you what has been  
9 marked for identification as State's Exhibit 3(a), and  
10 I'll ask you to study that. Do you recognize that photo?

11 A Yes, that is the photo of the young lady that I  
12 fingerprinted.

13 Q Does this photo fairly and accurately depict  
14 the way she appeared on February the 10th?

15 A Yes.

16 MS. MURPHY: Thank you. Your Honor, I would  
17 ask that State's Exhibit 3(a) be admitted at this time.

18 THE COURT: Any objection?

19 MS. GUTIERREZ: No, Your Honor.

20 THE COURT: Let it be admitted as State's  
21 Exhibit 3(a).

22 (State's Exhibit No. 3(a),  
23 previously marked for  
24 identification, was  
25 received in evidence.)

1 BY MS. MURPHY:

2 Q Ms. Talmadge, what did you do in your efforts  
3 to identify the body?

4 A I applied the printer's ink to the fingers.  
5 First of all, I had to find a finger that was not too  
6 severely decomposed so that I could see some ridge  
7 detail. I would then blot that finger dry because there  
8 is a lot of moisture on the fingers at that point in  
9 time. So I would blot it dry and then apply the  
10 printer's ink and place it on a contrasting background.

11 Q Were you able to identify this person?

12 A Yes, I was.

13 Q What was used for the comparison for the  
14 identification?

15 A I received a permanent resident card from the  
16 Department of Immigration and Naturalization, and it  
17 contained the right index finger of Hae Lee.

18 Q And that was, in fact, the identification you  
19 made?

20 A Yes, it was.

21 Q Now, shifting gears a little bit, did you have  
22 occasion to receive a report from Crime Lab Technician  
23 Frank Sanders?

24 A Yes, I did.

25 Q Did you receive lift cards with that report as



1 well?

2 A Yes.

3 Q What did you do with these items?

4 A The first thing I would do with the lift cards  
5 is examine them to see if we have any partial latent  
6 prints that are suitable for comparison, which means that  
7 I would be able to compare them either to a victim, a  
8 suspect, or a defendant.

9 MS. MURPHY: May I approach the witness, Your  
10 Honor?

11 THE COURT: Yes, you may.

12 (State's Exhibits Nos. 18,  
13 21 and 25, respectively,  
14 were marked for purposes  
15 of identification.)

16 BY MS. MURPHY:

17 Q Ms Talmadge, I am showing you what has been  
18 marked as State's Exhibits 18, 21, and 25. Can you  
19 please review these documents?

20 (Brief pause.)

21 A These are all documents that were prepared by  
22 me in reference to the homicide case of Hae Lee, Case  
23 Number 8B5801.

24 Q And this is your handwriting on these items?

25 A Yes.

1 Q I'll ask you to hang onto these.

2 A Okay.

3 Q Ms. Talmadge, did you have occasion to receive  
4 evidence under a property number which was 99008994?

5 A Yes, I did.

6 Q And referring to specifically your report which  
7 is marked Exhibit 21, what were you requested to do?

8 A I was requested under property number 99008994  
9 to process papers from the trunk of a vehicle.

10 Q What were the results of your findings?

11 A I processed the evidence and I developed  
12 partial latent prints on an envelope and a card which I  
13 marked as Exhibit 1 and 2. I then compared the partial  
14 latent prints that were developed to the prints of Adnan  
15 Syed and Jay Wilds and made the following identification.  
16 A partial latent print developed on the envelope marked  
17 Exhibit 1 and the card marked Exhibit 2, under property  
18 number 99008994, were identified as impressions of the  
19 right middle finger, the left thumb, and the left index  
20 finger of Adnan Syed.

21 Q Are those results fairly and accurately  
22 represented in your report which is marked as Exhibit 21?

23 A Yes, they are.

24 MS. MURPHY: Your Honor, I would ask to move  
25 that report as State's Exhibit 21 at this time.

1 THE COURT: Any objection?

2 MS. GUTIERREZ: No.

3 THE COURT: Let it be admitted at this time as  
4 State's 21.

5 (State's Exhibit No. 21,  
6 previously marked for  
7 identification, was  
8 received in evidence.)

9 MS. MURPHY: Your Honor, may I approach the  
10 witness?

11 THE COURT: Yes, you may.

12 BY MS. MURPHY:

13 Q Ms. Talmadge, I would ask you to review this  
14 item in evidence as State's Exhibit 20(a).

15 (Brief pause.)

16 A Okay.

17 Q Are you familiar with these items?

18 A Yes. The envelope is marked Exhibit 1, with  
19 the complaint number and the property number, my  
20 initials, and the date, and the card is marked as Exhibit  
21 2, with the case number, the property number, my  
22 initials, and the date.

23 Q The notations, Exhibit 1 and Exhibit 2, did you  
24 make those marks?

25 A Yes.

1 Q And the purplish color that you see on the  
2 envelope and the card, was that there when you first  
3 examined the items?

4 A No, this is the reaction of the chemical  
5 ninhydrin with the amino acids that were left behind in  
6 the perspiration.

7 Q Thank you. When you state the conclusion that  
8 the item was negative as to Jay Wilds, what does that  
9 mean?

10 A I had one print remaining on the envelope and  
11 it was compared to Jay Wilds with negative results.

12 Q Were you also asked to process evidence under  
13 property number 99008995, referring specifically to  
14 State's Exhibit Number 25 for identification?

15 A Yes, I was requested to process papers from the  
16 glove box.

17 Q What were the results?

18 A I developed suitable partial latent prints on  
19 Exhibits 1 through 5, which were various paper items that  
20 were found in the glove box. Those suitable partial  
21 latent prints were then compared to Adnan Syed and Jay  
22 Wilds with the following results: A partial print  
23 developed on the Nationwide insurance identification  
24 card, which is marked Exhibit 2, under property number  
25 99008995, was identified as an impression of the right

1 little finger of Adnan Syed. The --

2 MS. MURPHY: May I approach the witness, Your  
3 Honor?

4 THE COURT: Yes, you may.

5 BY MS. MURPHY:

6 Q Was your answer complete?

7 A I was going to say that the remaining partial  
8 latent prints were compared to Jay Wilds with negative  
9 results.

10 Q I will now show you what is in evidence as  
11 State's Exhibit 24. Could you examine these items,  
12 please?

13 (Brief pause.)

14 A This is Exhibit 1 and Exhibit 2 under property  
15 number 99008995. Exhibit 1 is an MVA registration  
16 certificate, and Exhibit 2 is the insurance  
17 identification card.

18 Q The results that you have just described, are  
19 they accurately depicted on State's Exhibit 25, your  
20 report?

21 A Yes, they are.

22 MS. MURPHY: Your Honor, I would ask that that  
23 report be moved into evidence at this time.

24 THE COURT: Any objection, Ms. Gutierrez?

25 MS. GUTIERREZ: No, Your Honor.

1 THE COURT: Okay. Let it be admitted at this  
2 time.

3 (State's Exhibit No. 25,  
4 previously marked for  
5 identification, was  
6 received in evidence.)

7 BY MS. MURPHY:

8 Q And again, Ms. Talmadge, the purplish tint that  
9 you see on these items, was that there when you first  
10 examined them?

11 A No, it was not.

12 Q Can you explain that, please?

13 A It's as a result of the chemical ninhydrin  
14 reacting to the amino acids in the perspiration.

15 Q Okay. Now, referring to your report which is  
16 identified as State's Exhibit 18, did you receive  
17 property under property number 99008998?

18 A Yes, I did.

19 Q And what were you requested to do?

20 A I was requested to process a map that was  
21 recovered from the vehicle to determine if there were any  
22 partial latent prints.

23 Q And what were your results?

24 A Several partial latent prints were developed  
25 from the map that were suitable for comparison. A

1 comparison was made to Adnan Syed and Jay Wilds with the  
2 following results: A partial latent print developed on  
3 the back cover of the map marked Exhibit 1(i) under  
4 property number 99008998 was identified as an impression  
5 of the left palm of Adnan Syed.

6 The remaining partial latent prints were  
7 compared to Jay Wilds with negative results.

8 Q Are those results accurately depicted in your  
9 report marked Exhibit 18?

10 A Yes.

11 MS. MURPHY: Your Honor, I would move Exhibit  
12 18 at this time.

13 THE COURT: Any objection?

14 MS. GUTIERREZ: No, Your Honor.

15 THE COURT: Let it be admitted as State's  
16 Exhibit 18.

17 (State's Exhibit No. 18,  
18 previously marked for  
19 identification, was  
20 received in evidence.)

21 MS. MURPHY: Thank you, Your Honor. May I  
22 approach the witness?

23 THE COURT: Yes, you may.

24 BY MS. MURPHY:

25 Q Ms. Talmadge, I show you what is in evidence as

1 State's Exhibit 18. Do you recognize this item? I'm  
2 sorry, State's Exhibit 17.

3 (Brief pause.)

4 A Yes, it's marked as Exhibit 1, along with the  
5 case number, the property number, my initials and the  
6 date.

7 Q And those notations were made by?

8 A Myself.

9 Q Is this the item that you examined in your  
10 report, State's Exhibit 18?

11 A Yes.

12 Q Could you, holding this item, show the ladies  
13 and gentlemen where the palm print was that you detected?

14 A The palm print is actually underneath where the  
15 State's exhibit number is (indicating).

16 Q Ms. Talmadge, unlike the exhibits you have  
17 already identified, there are black smudges on this item.  
18 Were they there when you first examined the item?

19 A No, they were not.

20 Q Can you account for those smudges?

21 A Yes. As I said before, porous surfaces are  
22 processed with the chemical ninhydrin because the oil and  
23 perspiration is absorbed. If you can see, this is a  
24 glossy, basically hard surface, so the print is going to  
25 stay on top of the surface. So the black graphite powder



1 along with the zephyr brush was used to process the  
2 cover.

3 MS. MURPHY: Thank you.

4 (Brief pause.)

5 (State's Exhibit No. 23  
6 was marked for purposes  
7 of identification.)

8 BY MS. MURPHY:

9 Q Now, referring to the other report which is  
10 marked as State's Exhibit 23, were you asked to examine  
11 evidence under property number 99009000?

12 A Yes, I was requested to process what was  
13 labeled as personal items from the back seat of the  
14 vehicle.

15 Q And what were your results?

16 A I developed partial latent prints on floral  
17 paper, which was marked as Exhibit 1. I then compared  
18 those partial latent prints to the prints of Adnan Syed  
19 and Jay Wilds with the following results: Partial latent  
20 prints that were developed on the floral paper marked  
21 Exhibit 1 under property number 99009000 were identified  
22 as impressions of the left index finger, the left thumb  
23 and the left palm of Adnan Syed.

24 Q Are those results fairly and accurately  
25 reflected in State's Exhibit 23, your report?

1           A     Yes.

2                     MS. MURPHY: Your Honor, I would ask that  
3 State's Exhibit 23 be moved into evidence.

4                     THE COURT: Any objection.

5                     MS. GUTIERREZ: No, Your Honor.

6                     THE COURT: Let it be admitted.

7                                     (State's Exhibit No. 23,  
8                                     previously marked for  
9                                     identification, was  
10                                    received in evidence.)

11                    MS. MURPHY: May I approach the witness, Your  
12 Honor?

13                    THE COURT: Yes, you may.

14                    MS. MURPHY: Thank you.

15                    BY MS. MURPHY:

16                    Q     Ms. Talmadge, I now ask you to examine what is  
17 in evidence as State's Exhibit 22. Please study that  
18 item and tell us if you recognize it.

19                                    (Brief pause.)

20                    A     Yes, this is the floral paper, and it's marked  
21 Exhibit 1 with the case number, the property number, my  
22 initials and the date.

23                    Q     And this is the item which your report refers  
24 to as having a positive identification?

25                    A     That's correct.

1 Q Thank you. Ms. Talmadge, you examined a number  
2 of items in connection with this case. Did they all have  
3 prints on them?

4 A No.

5 Q What other efforts, if any, did you make to  
6 determine the source of remaining prints that were not  
7 identified?

8 A Well, there were several prints that were  
9 remaining from everything that was processed and also  
10 from what Mr. Sanders recovered from the vehicle. The  
11 remaining partial latent prints, if they were suitable to  
12 go into our computer system, I did enter sixteen prints  
13 into the Morpho computer system to see if we could come  
14 up with any identifications, and we did not make any  
15 identifications off of those remaining prints.

16 Q How are prints obtained for your computer  
17 system?

18 A The data banks?

19 Q Yes.

20 A We have a data base of approximately 1.5  
21 million fingerprint cards. It's a State system and it  
22 contains in excess of 800,000 criminal prints and it also  
23 contains the prints of anyone who might have anything to  
24 do with childcare. State troopers prints are in there.  
25 When these prints are received at the State Police, they

1 are entered into the computer system and retained in the  
2 data base. Then if I get prints from a crime scene or  
3 from evidence that is good enough to go into the  
4 computer, we enter those into the computer system and  
5 compare it against that data base of 1.5 million.

6 MS. MURPHY: The court's indulgence, please.

7 THE COURT: Yes.

8 (Brief pause.)

9 MS. MURPHY: Thank you, Your Honor. We have no  
10 more questions.

11 THE COURT: Thank you. Witness with you.

12 MS. GUTIERREZ: Mr. Clerk, could I have, I  
13 think it's State's Exhibit 16.

14 THE CLERK: Yes.

15 MS. GUTIERREZ: Thank you. Ms. Talmadge, I  
16 have a couple questions to ask you.

17 CROSS-EXAMINATION

18 BY MS. GUTIERREZ:

19 Q You were asked about you examined a lot of  
20 other pieces of evidence for which there were no latents  
21 developed, correct?

22 A That's correct.

23 Q And you were asked to examine other pieces of  
24 evidence for which you couldn't develop latents, correct?

25 A That's correct.

1 Q Let me show you what has been previously marked  
2 as State's Exhibit 16. Is that one of those such pieces  
3 that you were asked to examine?  
4 A Yes.  
5 Q And that is a map page?  
6 A Yes.  
7 Q And did you establish whether or not that map  
8 page correlates in any way to the map book that you have  
9 identified under the sticker in the back, the palm print  
10 of my client, Adnan Syed?  
11 A This goes in that book, right.  
12 Q And did you establish where it goes in the  
13 book?  
14 A It has the page on it, yes.  
15 Q Well, did you check to see if, in fact, there  
16 is a page number that matches that page number already in  
17 there?  
18 A No, I did not.  
19 Q Okay. And did you conduct an investigation on  
20 this page?  
21 A Yes.  
22 Q Okay. And what is it that you did?  
23 A I sprayed this page with the chemical  
24 ninhydrin.  
25 Q And that's the chemical that would produce and

1 produced on the other exhibits the purplish-like  
2 appearance?  
3 A Yes.  
4 Q Okay. And that's because as paper, unlike the  
5 cover, the glossy cover, this is a porous surface?  
6 A That's correct.  
7 Q And this (indicating) is a non-porous surface?  
8 A The cover is, yes.  
9 Q Right, the cover is, and that's why you process  
10 them differently, correct?  
11 A That's correct.  
12 Q Were you told any information about this  
13 exhibit, i.e. where it came from and what if any  
14 significance it had to the case?  
15 A I was told that it was from the back area of  
16 the vehicle.  
17 Q Okay. And that's all that you were told,  
18 correct?  
19 A Yes.  
20 Q And having processed it, did you recover any  
21 latent prints from any portion of this page?  
22 A No.  
23 Q The front --  
24 A No.  
25 Q -- or the back?

1           A     No.

2           Q     Okay.  And so you were not able to lift any  
3           prints that would then allow you to then compare them  
4           with any other prints?

5           A     That's correct.

6           Q     And you, Ms. Talmadge, I'm sure, in your  
7           expertise, did your best to find prints on this page, did  
8           you not?

9           A     That's correct.

10          Q     Okay.  Now, in regards to the map book, Ms.  
11          Talmadge, the surface, as was described, it is a glossy  
12          cover; is it not?

13          A     Yes, it is.

14          Q     It's thicker, it's cardboard of some kind, and  
15          it's covered with some kind of film or coating that  
16          presents a flat, glossy, non-porous surface; is that  
17          correct?

18          A     That's correct.

19          Q     The best kind of surface to collect a  
20          fingerprint; isn't that correct?

21          A     That's correct.

22          Q     If it's capable of collecting it and if  
23          something else doesn't remove it by a later touching, one  
24          should be able to get a latent print from this surface  
25          fairly readily, correct?

1           A     It's possible, yes.

2           Q     Okay. Now, you did not search the inside of  
3 the map book either from the front or from the back cover  
4 to see if you could recover any other latent prints from  
5 any internal page?

6           A     Yes, I did.

7           Q     And what pages did you search?

8           A     I searched approximately forty pages and the --

9           Q     Okay. And by searching, did that include  
10 processing with the chemical that produces the purplish-  
11 like --

12                   MS. MURPHY: Your Honor, I would ask that the  
13 witness be allowed to finish her answers.

14                   THE COURT: Fine. I would ask, as I asked  
15 earlier, that the question be asked and that there be a  
16 little bit of a pause so that the witness can answer. I  
17 would ask you, if you have not finished your answer, that  
18 you let me know, and you can continue finishing your  
19 answer if at anytime another question comes in. We can  
20 use that process with all of the witnesses, not only Ms.  
21 Gutierrez's but the State's as well. I think that will  
22 be helpful.

23                   BY MS. GUTIERREZ:

24           Q     Okay. Had you finished answering my very  
25 simple question, Ms. Talmadge?



1           A     I was trying to get my photos out --  
2           Q     Your photographs.  
3           A     -- to answer.  
4           Q     Because you record what you do, do you not?  
5           A     Yes.  
6           Q     And you keep track of it by both numbering it  
7     and photographing exactly what you do, correct?  
8           A     That's correct.  
9           Q     And what you have drawn out are the photographs  
10    that you made contemporaneous with any examination  
11    regarding these specific property numbers, correct?  
12          A     That's correct.  
13          Q     And if you could review for a minute, Ms.  
14    Talmadge, those photographs and see if you could identify  
15    the map page numbers which you processed back in February  
16    of 1999?  
17                   (Brief pause.)  
18          A     As I said, I did approximately forty pages and  
19    I developed prints on Exhibit 1(b), Exhibit 1(c), another  
20    one from 1(c), another one from 1(c).  
21          Q     Now, the (a), (b) and (c) are your notations,  
22    are they not?  
23          A     That's correct.  
24          Q     You give a letter to everything that you  
25    examine under a specific property number, correct?

1           A     That we develop --

2           Q     And then you would go ahead and assign your  
3 numbering system?

4           A     That we develop suitable partial latent prints  
5 on.

6           Q     Okay.

7           A     So Exhibit 1(b) would relate to the table of  
8 contents.

9           Q     Okay.

10          A     1(c) is page thirty-eight of the map book.  
11 1(d) is page forty. That's another one from page forty.  
12 1(e) is page forty-two, another from page forty-two.  
13 1(f) is page forty-six. 1(g) is page seventy-eight.  
14 1(h) is page eighty-three. 1(i) is the back cover.  
15 1(i), another one from the back cover. And then I also  
16 had Exhibit 1(a) which was the front cover.

17          Q     Okay. And that means that you obtained a  
18 latent print that belonged to someone on each of those  
19 page numbers and locations that you have just listed?

20          A     That's correct.

21          Q     But that you were not able to compare them to  
22 the fingerprints that were submitted to you of Adnan  
23 Syed?

24          A     They were compared but they were not  
25 identified.

1 Q Okay.

2 A Except for the one print that was on the back  
3 cover.

4 Q The back cover of the map magazine that you  
5 have told us was the palm, that actually appeared right  
6 under this little red sticker; is that correct?

7 A That's correct.

8 Q Now, the inside page numbers, Ms. Talmadge,  
9 were not selected for you, were they?

10 A No, they were not.

11 Q You just randomly selected some pages, correct?

12 A That's correct.

13 Q Your attention was not directed either in the  
14 request of you to examine them or orally by anyone  
15 involved in the case from the Police Department to look  
16 at a specific page number?

17 A No, it was not.

18 Q Other than the flat sheet that was submitted to  
19 you separately?

20 A That's correct.

21 Q Now, the surface as was described of the map  
22 book is a pretty good surface for collecting and  
23 sustaining a fingerprint or palmprint or footprint for  
24 that matter that is placed there at any given time; is  
25 that correct?

1           A     It's possible, yes.

2           Q     And there are, as you have told us, there are  
3 certain surfaces that are better for the collection of  
4 fingerprints than others, correct?

5           A     Yes.

6           Q     Even on surfaces that are better than others,  
7 your expertise can only identify whatever print it is,  
8 correct?

9           A     I'm not sure I understand what you are asking  
10 me.

11          Q     Your expertise looks at a latent print and  
12 identifies it and compares it to other latent prints,  
13 correct?

14          A     And also processing of the evidence.

15          Q     Okay. You see if, in fact, there are prints  
16 there, right?

17          A     Yes.

18          Q     Your expertise, however, never attempts, nor  
19 can it, to establish when the print that you lift and  
20 compare got where it was from where you looked, can it?

21          A     Scientifically, we cannot determine the age of  
22 a latent print.

23          Q     Unscientifically, you can't determine the age  
24 of a print, can you?

25          A     It would depend upon the circumstance.

1 Q There was no circumstantial information that  
2 was submitted to you to establish when the palmprint that  
3 you lifted from this back cover was placed there, was  
4 there?

5 A No, there was not.

6 Q And you, of course, make no attempt, nor do you  
7 in your expert opinion render any opinion as to when it  
8 was placed, do you?

9 A No, I do not.

10 Q Nor can you?

11 A No.

12 Q Okay. And you, of course, in your expertise  
13 also can't tell us under what circumstances the palmprint  
14 that you subsequently compared was placed there?

15 A No, I cannot.

16 Q You, of course, were only given information  
17 where this book was recovered inside a car that was  
18 relative to a crime, correct?

19 A That's correct.

20 Q You were not given any information that might  
21 help you establish when this book was placed at the place  
22 from where it was recovered, were you?

23 A No, I was not.

24 Q Nor would that information affect your expert  
25 opinion in regard to when and under what circumstances it

1       might have been placed there?  
2           A     No.  
3           Q     And you, of course, don't know who owns this  
4       book?  
5           A     That's correct.  
6           Q     And how often it was used?  
7           A     That's correct.  
8           Q     And whether or not it had recently been put in  
9       the car or whether it had been put in the car at the very  
10       time that the owner or driver acquired the car?  
11          A     I do not know those things.  
12          Q     And you don't know if the map book was kept or  
13       taken out on a regular basis?  
14          A     I do not know that.  
15          Q     Or lent to someone else totally unrelated to  
16       the owner?  
17          A     I don't know that.  
18          Q     Or placed in the car right before the car was  
19       found?  
20          A     I don't know that either.  
21          Q     And in regard to State's Exhibit 16 though, you  
22       lifted no prints that were suitable for comparison,  
23       correct?  
24          A     That's correct.  
25          Q     That doesn't mean that nobody touched either

1 side of this page, does it?

2 A That's correct.

3 Q It only means that you couldn't lift prints,  
4 right?

5 A I was not able to develop any prints, yes.

6 Q And you are an expert at trying to develop  
7 prints from things submitted to you; are you not?

8 A That's correct.

9 Q That's why you are the supervisor of so many  
10 people; is it not?

11 A That's correct.

12 Q But it doesn't mean -- for instance, a hundred  
13 people could have touched this page at any given time;  
14 could they have not?

15 A Yes.

16 Q And each person's touching could have wiped out  
17 the other person's print, correct?

18 A That's possible, yes.

19 Q And your examination can't tell us whether that  
20 happened or whether this was a completely untouched  
21 perfectly flat page before it was recovered from wherever  
22 it was recovered? Your expertise can't tell us that, can  
23 it?

24 A No.

25 Q Your expertise, Ms. Talmadge, can't tell us how

1 long the prints had been there, can it?  
2 A That's correct. No, I cannot.  
3 Q Even the palmprint?  
4 A No, I cannot.  
5 Q Now, Ms. Talmadge, it is not unusual to find  
6 fingerprints of persons around their own space, is it?  
7 A Actually, developing a partial print in itself  
8 is rather rare. Most of the time when we process, we do  
9 not get suitable prints.  
10 Q And that's because a lot of surfaces are  
11 touched by a lot of people under a lot of circumstances,  
12 correct?  
13 A That's correct.  
14 Q And every touching might alter the existence of  
15 every other fingerprint that may have been left there  
16 under other circumstances?  
17 A That's correct.  
18 Q Okay. But it is not unusual, for instance, for  
19 you to be able to find, if at all, my fingerprints in a  
20 car that I drive everyday?  
21 A If your hand contained enough oil and  
22 perspiration --  
23 Q At the time?  
24 A -- at the time --  
25 Q Right.



1           A     -- and touched an object, it's possible that  
2     you could leave a latent print.

3           Q     Okay. My question was though, it would not be  
4     unusual in and of itself -- it might be unusual to  
5     recover prints, period -- to recover my own prints in a  
6     car I operated and drove everyday?

7           A     Yes, it's possible.

8           Q     Okay. And not only is it possible, it would  
9     not be unusual to do so, would it?

10          A     No.

11          Q     Okay. And if, for instance, I had a car and  
12     not only did I drive it to work everyday but I regularly  
13     picked up my neighbor and she drove in my car everyday,  
14     it would also, if there were suitable oils and suitable  
15     conditions at any given time that she touched any surface  
16     inside my car, it would again not be unusual for you to  
17     be able to identify her prints under those circumstances,  
18     would it?

19          A     No, it would not.

20          Q     And if I had a child who didn't ride in the car  
21     everyday but was in my car often, and again had suitable  
22     oils on their hands, it would again not be unusual if  
23     those conditions existed to be able to retrieve and then  
24     identify his or her prints, would it?

25          A     No, it would not.

1 MS. GUTIERREZ: May I approach the witness,  
2 Your Honor?

3 THE COURT: Yes, you may.

4 BY MS. GUTIERREZ:

5 Q You were shown State's Exhibit 20(a), which is  
6 admitted into evidence. Do you recall that?

7 A Yes.

8 Q Now, other than the purple discoloration, you  
9 didn't do anything to that envelope, did you, in making  
10 your marks? You didn't obliterate anything on it,  
11 correct?

12 A No.

13 Q Now, if you take a look at the front of the  
14 card that's stuck in it, it appears to relate to the  
15 envelope, does it not?

16 A Yes.

17 Q Okay. On the front of the envelope, there is a  
18 date; is there not?

19 A That's correct.

20 Q Okay. And you recovered a fingerprint from the  
21 envelope itself; did you not?

22 A Yes.

23 Q And was that from the front or the back of the  
24 envelope?

25 A If you could give me a moment.

1           Q     Sure.

2                     (Brief pause.)

3           THE COURT:  While she is looking, Ms.

4     Gutierrez, may I inquire about how much longer you will

5     be?

6           MS. GUTIERREZ:  Not very much longer, Your

7     Honor.

8           THE COURT:  Okay.

9           MS. GUTIERREZ:  Take your time.

10          THE WITNESS:  Okay.

11          (Brief pause.)

12          THE WITNESS:  I have a print from the front of

13     the envelope.

14          BY MS. GUTIERREZ:

15          Q     The front, meaning where the addressee's name

16     is listed; is that correct?

17          A     Yes.

18          Q     Okay.

19          A     And the back of the envelope.

20          Q     The back of the envelope because your picture

21     actually shows the crease of the envelope flapover cover;

22     does it not?

23          A     That's correct.

24          Q     Okay.  And both were on the outside of the

25     envelope; were they not?

1           A     That's correct.

2           Q     If you notice, Ms. Talmadge, the envelope is  
3     dated by the post office October 3rd, 1998; is it not?

4           A     That's correct.

5           Q     You, of course, don't know when any of that  
6     envelope was received by any particular person; do you?

7           A     No, I do not.

8           Q     Including the addressee on the envelope,  
9     correct?

10          A     That's correct.

11          Q     And you, of course, don't know how it got from  
12     the address on the envelope to the location from where it  
13     was retrieved, if it got to that location; do you?

14          A     No, I do not.

15          Q     Or under what circumstances?

16          A     No, I do not.

17          Q     And you, of course, don't know how long it had  
18     been in the place from where it was recovered before it  
19     was submitted to you?

20          A     No, I do not.

21          Q     And you, of course, conducted no investigation  
22     into the circumstances of the finding of this envelope;  
23     did you?

24          A     No.

25          Q     Or as to how it got to where it was?

1           A     No, I did not.

2           Q     You merely took what was submitted to you and  
3 sought to see if you could recover fingerprints?

4           A     That's correct.

5           Q     And you can tell us what fingerprints you could  
6 match, what you could recover and/or match, but you can't  
7 tell us anything about them?

8           A     Other than --

9           Q     That they existed where you saw them, correct?

10          A     Yes, and that I did identify them.

11          Q     And whether or not they identified and matched  
12 with other fingerprints submitted to you, correct?

13          A     Yes.

14          Q     In regard to the flowered paper, is this how it  
15 appeared when it was submitted to you?

16          A     It was actually a little more rolled up.

17          Q     Folded up?

18          A     Yes.

19          Q     Okay. Now, from its size and shape, does it  
20 not appear to be paper and tissue that may have once  
21 surrounded flowers?

22          A     Yes.

23          Q     You can't tell from your examination if, in  
24 fact, it did; could you?

25          A     There were a little bit of stems, flower stems,

1 and things that were inside there laying around it.

2 Q That corroborated your impression that there  
3 were once flowers in there, correct?

4 A That's correct.

5 Q But you couldn't tell from your examination  
6 what those flowers were; could you?

7 A No, they were dead.

8 Q Or for whom they were intended?

9 A No.

10 Q And if they were received by the person for  
11 whom they were intended?

12 A No, I couldn't tell that.

13 Q And the fingerprint that you located was on the  
14 outside of the paper (indicating); was it not?

15 A Yes, in the manner that you --

16 Q In the manner that I'm doing.

17 A Yes.

18 Q And whether or not the fingerprint that you  
19 identified was placed there by the giver of the flowers  
20 to the receiver of the flowers; could you?

21 A I don't know that circumstance.

22 Q Or was placed there by the receiver of the  
23 flowers, having been given them by someone other than the  
24 owner of the print?

25 A I can't tell who was given the flowers from the

1 print.

2 Q And you can't tell when they were given?

3 A That's correct.

4 Q And whether or not that was a happy or a sad  
5 occasion?

6 A That's correct.

7 Q And anything else about the circumstances as to  
8 how that print got there?

9 A No, I cannot.

10 Q Or how long it had been there?

11 A No.

12 Q Or how long after the print had been placed  
13 that this particular evidence of what appears to be  
14 flowers inside had been at the place from where it was  
15 recovered?

16 A I cannot tell that.

17 Q And in your expertise, you wouldn't attempt to  
18 tell us that; would you?

19 A Not from that paper, no.

20 (Brief pause.)

21 THE COURT: Ms. Gutierrez, we are going to  
22 pause at this point.

23 MS. GUTIERREZ: I just really have one more  
24 question, Your Honor.

25 THE COURT: Well, you are going to have some

1 followup; are you not?

2 MS. MURPHY: Just briefly, Your Honor.

3 THE COURT: Okay. We are going to take a break  
4 then. Ladies and gentlemen, we are going to recess for  
5 probably about twenty to twenty-five minutes so that I  
6 can handle my morning docket. At this time, I need to  
7 advise you not to discuss the testimony you have heard in  
8 this case. I need to ask that you not talk about it  
9 amongst yourselves or with anyone else. I also need to  
10 ask you to place your notepads face down on your chairs  
11 and leave them here. They will be secured. No one will  
12 read them. You will be coming back in about twenty to  
13 twenty-five minutes and we will continue with this case.  
14 I would also ask that at the time that you go back, keep  
15 in mind that this is a break and we are going to resume  
16 with this case. Then once you come back, we will go on  
17 until about 12:30, a quarter of 1:00, take a luncheon  
18 recess, and resume about 2:00 or so to finish with the  
19 testimony for the rest of the day.

20 During the break, also keep in mind that I  
21 expect to go today to about 5:00. So if you need to make  
22 any arrangements to make sure that you can get home in  
23 the evening hours or if your vehicle is in a location  
24 that you need to make an adjustment during the luncheon  
25 recess, you are welcome to do that. Also, if you would



1       like to use the twenty to twenty-five minutes to do that,  
2       you may also use that time as well because it will be at  
3       least twenty to twenty-five minutes before we can resume  
4       this case.

5                At this time, I'm going to ask that you all go  
6       with Ms. Connolly, who will escort you back to the jury  
7       room. Also, as you are going out, there is a canteen on  
8       the second floor of this building. Please feel free to  
9       go down and get yourselves a cup of coffee or a cup of  
10      tea and bring that back up to the jury room because,  
11      again, you will be sitting there for about twenty to  
12      twenty-five minutes before we will be able to resume.  
13      Thank you.

14               (The jury was excused from the courtroom.)

15               THE COURT: Okay. This court stands in recess  
16      for the next twenty to twenty-five minutes for this case.  
17      However, all those that are on my docket, do not go  
18      anywhere. I'm just going to let everyone clear out, and  
19      then we will resume this case promptly.

20               I need some assistance first. I need to find  
21      out whether or not any of the jurors, in fact, left the  
22      jury room. If you could just secure them in the jury  
23      room until Officer Gilmore finishes doing what he needs  
24      to do. Officer Church, if they have left, let Officer  
25      Gilmore know that as well. If they have not left, tell

1       them to wait one second before they go anywhere. Officer  
2       Gilmore, if you will just coordinate with Deputy Church,  
3       I'm going to be asking that you bring up three co-  
4       defendants so that we can handle another matter.

5               OFFICER GILMORE: Okay.

6               THE COURT: Okay. None of the jurors have  
7       left?

8               THE CLERK: No, I put them in the jury room.

9               THE COURT: Okay. Thank you.

10              MR. URICK: Your Honor, if I may address the  
11       scheduling issue, we have Don Cliendinst physically  
12       present as the next witness after Ms. Talmadge. We have  
13       Sal Bianca from the Crime Lab on call. I'm not certain  
14       but I think Mr. Cliendinst should fill until the lunch  
15       break.

16              MS. GUTIERREZ: I don't think so.

17              THE COURT: Well, Mr. Urick, it's your case. I  
18       have no idea how many witnesses you have. I don't know  
19       how long the witnesses are. I told you how long I  
20       expected that we would sit. You will have to figure out  
21       whether you think that that person's testimony is long  
22       enough to fill that void. I don't know how long that  
23       witness is and I certainly don't have any idea how long  
24       Ms. Gutierrez's cross is going to be. But I can tell  
25       you, if you finish with the witness and you don't have

1 another witness available, and it's almost lunchtime, we  
2 will take a lunch break. I mean, we will accommodate you  
3 in that fashion.

4 MR. URICK: Thank you.

5 THE COURT: All right. Very well.

6 MS. MURPHY: Your Honor, may Ms. Talmadge take  
7 a break?

8 THE COURT: Yes. Ms. Talmadge, you are also  
9 free to take a break. We will be away for about twenty-  
10 five minutes. During that time, you may not discuss your  
11 testimony with anyone. You are on the witness stand, so  
12 you may not have a conversation with the State or the  
13 defense or anyone about your testimony until you have  
14 concluded.

15 All right. Very well. You may go about your  
16 business and return in about twenty to twenty-five  
17 minutes.

18 THE WITNESS: Thank you.

19 THE COURT: All right. I'm going to take a two  
20 or three minute recess while they bring the defendants  
21 up, and then I will handle the rest of our docket.

22 THE CLERK: All rise. This court will take a  
23 brief recess at this time.

24 (Brief recess.)

25 -o0o-

1 (Jury not present upon reconvening.)

2 THE CLERK: All rise. This court resumes in  
3 session.

4 THE COURT: Please be seated. We are going to  
5 bring the jury back out and resume this case. Please be  
6 seated, counsel.

7 (Brief pause.)

8 (The jury returned to the courtroom.)

9 THE COURT: Please be seated. All right.  
10 Ladies and gentlemen, we are going to resume with our  
11 case today.

12 As our last witness was still on the stand at  
13 the time we took a recess, I will remind you that you are  
14 still under oath.

15 At that time, Ms. Gutierrez was conducting  
16 cross-examination and I believe she had a few more  
17 questions.

18 SHARON TALMADGE  
19 resumed the witness stand and, having been reminded she  
20 was still under oath, was examined and testified further  
21 as follows:

22 CROSS-EXAMINATION (Continuing)

23 BY MS. GUTIERREZ:

24 Q Ms. Talmadge, essentially I only have one.  
25 Now, you told me in response to my questions, or you told

1 us that, of course, in your expertise, even when you find  
2 a fingerprint, you can't tell when the fingerprint had  
3 been placed there, correct?

4 A That's correct.

5 Q And you can't tell, even when you get the best  
6 of a latent print or lift, how long it had been there,  
7 correct?

8 A That's correct.

9 Q And what, if anything, had happened to the  
10 place where the fingerprint was, whether it's a glass  
11 pane or a map book or a piece of paper, whether or not of  
12 those, other than the person who deposited the  
13 fingerprint or the palmprint there, had touched it  
14 afterwards?

15 A If they left no ridge detail, I would not be  
16 able to tell.

17 Q And that might occur not because they didn't  
18 touch it hard enough but they might not have had enough  
19 oil on their own hands at the time they touched that  
20 surface, correct?

21 A That's correct.

22 Q A fingerprint, regardless of its condition, or  
23 a palmprint, regardless of its condition, if it is placed  
24 on a good surface, can essentially, if it's not  
25 obliterated by something or someone else, can last

1 forever; can it not?

2 A Under ideal circumstances, they can last  
3 indefinitely.

4 Q And sometimes under less than ideal  
5 circumstances, they can last a very long time?

6 A It's possible, yes.

7 Q Years, in fact?

8 A It depends upon the surface, yes.

9 Q But it is possible, yes?

10 A Yes.

11 MS. GUTIERREZ: Thank you.

12 THE COURT: Thank you, Ms. Gutierrez. Any  
13 redirect?

14 MS. MURPHY: Thank you, Your Honor.

15 REDIRECT EXAMINATION

16 BY MS. MURPHY:

17 Q Ms. Talmadge, do your reports which we have  
18 entered into evidence indicate where specifically in the  
19 car the items were recovered?

20 A It's designated as back seat or the glove box  
21 or the trunk.

22 Q Ms. Talmadge, in your experience, would it be  
23 unusual, if someone was not the owner of a particular  
24 vehicle, to identify prints on items located not just in  
25 the car but in the trunk, in the glove box, and in the

1 back seat? All of those areas, and identification of a  
2 print, would those things be unusual?

3 A Well, as I said before, it's rather unusual  
4 that you do develop a print at all because it is very  
5 hard to leave a print that is suitable for comparison.  
6 But in this particular instance, as you pointed out, we  
7 have prints from the glove box, prints from the items in  
8 the back seat, and we have prints from the trunk of the  
9 vehicle that are all identified to the same person.

10 Without that being the owner of the vehicle, I  
11 would say yes, that would be unusual.

12 Q While you were able to develop a number of  
13 prints, were you able to positively identify any prints  
14 other than those of Adnan Syed?

15 A No, I was not.

16 MS. MURPHY: Thank you. I have no other  
17 questions, Your Honor.

18 RE-CROSS-EXAMINATION

19 BY MS. GUTIERREZ:

20 Q Ms. Talmadge, do you even know who the owner of  
21 the car was?

22 A No, I do not.

23 Q And do you even know whether or not the actual  
24 owner of the car was ever actually inside the car?

25 A No, I do not.

1           Q     And you don't know, in fact, from your own  
2     personal knowledge, who were the persons and/or persons,  
3     in the plural, who drove the car on a regular basis,  
4     correct?

5           A     I have no idea.

6           Q     Or who were in the car, whether it was being  
7     driven or while it was parked, correct?

8           A     That's correct.

9           Q     And you, of course, were not given any other  
10    prints, ink prints, to compare with whatever lifts or  
11    latents you got; were you?

12          A     Only the prints of --

13          Q     Jay Wilds.

14          A     -- Jay Wilds.

15          Q     And Jay Wilds was listed on your form as a  
16    suspect; was he not?

17          A     He is in that section of the report, yes.

18          Q     The section of the report. It comes to you as  
19    a form, does it not, requesting you to do your analysis?

20          A     Yes.

21          Q     And on that form, before you got it, the name  
22    Jay Wilds was listed in the portion that identifies  
23    suspects; was it not?

24          A     Yes, it is listed there.

25          Q     And there was no other name in there other than



1 Adnan Syed and Jay Wilds?

2 A No, there was not.

3 Q Now, you, of course, in your expertise, do not  
4 know why and under what circumstances Jay Wilds came to  
5 be regarded as a suspect; do you?

6 A No, I do not.

7 Q Nor do you know how Adnan Syed came to be  
8 regarded as a suspect?

9 A No, I do not.

10 Q Or if, in fact, Adnan Syed only became a  
11 suspect when Jay Wilds said he was? You wouldn't know  
12 that; would you?

13 A No, I wouldn't.

14 Q That's not part of your expertise; is it?

15 A No, it's not.

16 Q And you, of course, were not asked to determine  
17 if, in fact, that car contained any fingerprints that  
18 might match the owner of the car?

19 A I don't know who the owner of the car is.

20 Q But in any event, you weren't asked to match  
21 anything that you found with prints identified to you as  
22 belonging to the owner of the car; were you?

23 A No.

24 Q Nor were you asked to identify any lifts of  
25 latents together with anyone who may have driven or been

1 in the car on a regular basis?

2 A The only thing that I had was a couple of  
3 prints that I managed to obtain from Hae Lee to compare.

4 Q And did you do so?

5 A Yes, I did.

6 Q Okay. And did you fill out a report?

7 A No, I did not.

8 Q Were you asked to do so?

9 A That's done automatically.

10 Q Okay. And, again, you have never been provided  
11 any factual information as to who else's prints might be  
12 expected to appear inside or outside that car?

13 A No, I have not.

14 Q In regard to the items that Ms. Murphy just  
15 asked you, there were certain items recovered from the  
16 trunk of the car, correct?

17 A That's correct.

18 Q And they were identified to you as to where  
19 they were recovered, correct?

20 A That's correct.

21 Q And you, of course, not only were not provided  
22 any information, you could not ascertain when, under what  
23 circumstances, or by whom those items had been placed  
24 from where they were retrieved?

25 A No.

1 Q Nor how long they had been there?  
2 A That's correct.  
3 Q And the items in the glove box, they were  
4 identified to you regarding their location when they were  
5 submitted to you; were they not?  
6 A That's correct.  
7 Q And in regard to those items, you can't tell us  
8 when they were placed in the glove box?  
9 A No, I cannot.  
10 Q Or where they came from before they were placed  
11 there?  
12 A No.  
13 Q Or by whom they had been placed there?  
14 A No.  
15 Q And you can't, of course, tell us how often,  
16 from the time that you cannot determine that they were  
17 placed there, they were removed from the glove box?  
18 A No, I cannot.  
19 Q For legitimate purposes --  
20 A No.  
21 Q -- or illegitimate purposes, right?  
22 A That's correct.  
23 Q You, for instance, can't tell us if the  
24 registration and the insurance card were removed by a  
25 driver who had the permission to drive the car from

1 someone with the apparent authority to give it who  
2 retrieved the registration and the insurance information  
3 because of a minor fender-bender that occurred while they  
4 were driving; can you?  
5 A No, I cannot.  
6 Q Or whether or not the person you have  
7 identified as having the prints on the latents lifted  
8 from those items retrieved those items from the glove  
9 compartment because they were asked to do so by the  
10 driver for similar reasons such as an accident?  
11 A I have no idea.  
12 Q Or a traffic stop --  
13 A No.  
14 Q -- by a police officer --  
15 A No.  
16 Q -- who legitimately stopped the driver for say  
17 speeding?  
18 A I have no idea.  
19 Q You have no idea of when those prints were  
20 placed there, right?  
21 A That's correct.  
22 Q Only that they appeared when you attempted to  
23 lift them, correct?  
24 A That's correct.  
25 Q And that date is on February 9th?

1           A     (No response.)

2           Q     I'm sorry. That date was after February 9th;

3           was it not?

4           A     That's correct.

5           Q     And you can't tell us anything about that print

6           or prints or palmprints other than that, that it

7           appeared, correct?

8           A     The only piece of evidence that has a date on

9           it at all that would indicate a time would be the

10          envelope that is postmarked October 3rd.

11          Q     October 3rd, 1998, correct?

12          A     That's correct.

13          Q     And if, in fact, that is a real post office

14          franking symbol on the envelope, then you can tell us

15          that anything should have occurred after then, correct?

16          A     Yes.

17          Q     Correct?

18          A     That's correct.

19          Q     Okay. Except you can't tell us who mailed the

20          letter; can you?

21          A     No, I cannot.

22          Q     And you can't tell us whether or not the letter

23          was mailed before October 3rd, the franking date, by the

24          exact person whose print you identified; can you?

25          A     No, I cannot.

1 Q So as I just asked, you really can't tell us  
2 anything definitive about when any print that you have  
3 identified was placed where you lifted it from; can you?

4 A No.

5 MS. GUTIERREZ: Thank you.

6 THE COURT: Anything further on recross?

7 MS. MURPHY: Just briefly, Your Honor.

8 THE COURT: No, I mean from Ms. Gutierrez.

9 MS. GUTIERREZ: No, Your Honor.

10 THE COURT: All right.

11 MS. GUTIERREZ: Thank you.

12 THE COURT: Then re-redirect.

13 MS. MURPHY: Thank you, Your Honor.

14 RE-REDIRECT EXAMINATION

15 BY MS. MURPHY:

16 Q Ms. Talmadge, just to clarify something, your  
17 comparison with respect to these specific items which we  
18 have been discussing, they were not compared only to Jay  
19 Wilds; is that correct?

20 A As I stated before, the ones that were good  
21 enough to go into the computer system were searched  
22 through the computer system. They were checked with  
23 Adnan Syed and Jay Wilds.

24 Q And also to clarify, your results do  
25 definitively tell us one thing about four of these items,

1 and that is whose print is on those items; is that  
2 correct?

3 A That's correct.

4 Q And you were able to identify whose prints?

5 A Adnan Syed.

6 MS. MURPHY: No other questions, Your Honor.

7 THE COURT: Very well.

8 MS. GUTIERREZ: Nothing further.

9 THE COURT: May this witness be excused from  
10 the State?

11 MS. MURPHY: Yes, Your Honor.

12 THE COURT: And from the defense?

13 MS. GUTIERREZ: Yes, Your Honor.

14 THE COURT: And released from subpoena?

15 MS. GUTIERREZ: Yes.

16 THE COURT: Very well. You are free to go at  
17 this time, and you are released from subpoena at this  
18 time.

19 THE WITNESS: Okay.

20 THE COURT: I must admonish you that you may  
21 not discuss your testimony with anyone in that you are  
22 technically a sequestered witness, but because you have  
23 been released from subpoena at this time, you are welcome  
24 to stay in the courtroom if you would like.

25 THE WITNESS: Thank you.