State of Maryland * In The

Vs. * Circuit Cruit

Adnan Syed * of

No. 199103042-46 * Saltimore City

AMENDED STATE'S DISCLOSURE

NOW come Patricia C. Jessamy, State's Attorney for Baltimore City, and Revin Urick, Assistant State's Attorney, and in accordance with provisions of Rule 4-263(h) of the Maryland Rules of Projedure 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:

- The State never said the defense had received the results of a periology test by July 1, 1999;
- 2) To date the only report the State has received from Melissa Stangroom, Forensid Themist 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 Revia Crick

Certificate of Service

I HEREBY CERTIFY that on this 5th day of November, 1999, a copy of the aforegoing State's Sup[plemental Disclosure was:

	Served	cn	che	Defendant,	
<u></u>	Served	OM	the	Defendant's	Counsel;
				Defandant;	
	Mailed.	20	the	Defendant's	Counsel.

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REDMOND, BURGIN & GUTIERREZ, P.A.

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M. CRISTINA GUTTERREZ.

* Also admitted in the District of Columbia

October 29, 1999

VIA FACSHMILE, 410.727.5437 and FIRST CLASS MAIL

Kevin Urick, Esq. Office of the State's Attorney for Baltimore City Mitchell Caughouse 100 N. Caivert 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 seroiogy test done on the surped 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 1". 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.

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Kevin Urick, Esq. Office of the State's Attorney October 29, 1999 Fage 2

- 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 audioradiographs, dot blors slot blors, silver stained gels, test scrips, control strips, and any other results generated in the course of the analysis.
- 5. Copies of all laboratory notes generated in councetion with the analysis, including chain of custody documents, sizing and hybridization information, statistical calculations, and winksheets.
- 6 Laboratory protocols and procedures utilized in the analysis.
- 7. The identification of much genetic locus analyzad.
- 8. A statement setting forth the genotype data and the profile frequency for the decabases willized.

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.mil

cc: Court File

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FACEWILL FRANSMITTAL SHEET

DATE: 20.24.99
TO: 15 EVIN CHEICK, ESP FROM: M. Cristina Contierrox
FAX: 410.727.5437
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RB: 5 Marker L. Syers
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