**Ex. 11**

IN THE CIRCUIT COURT OF, ALABAMA JUDICIAL CIRCUIT

CRIMINAL DIVISION

STATE OF ALABAMA, )

)

PLAINTIFF, )

)

) CC0

XXXX, )

)

DEFENDANT. )

MOTION FOR PRODUCTION OF FORENSIC DATA

Comes the Defendant, XXXX, by counsel, and moves this Court pursuant to Alabama Rule of Criminal Procedure 16.1, and the Fifth, Sixth and Eighth Amendments to the United States Constitution, for an Order requiring the government to provide all of the following information and permitting counsel to inspect and copy or photograph the following:

SCIENTIFIC REPORTS

1. Copies of all data, results, rough notes, typed notes, records or reports of physical or mental examinations and of scientific tests or experiments made in connection with the alleged crimes (regardless of whether the results were conclusive or inconclusive) that are known or through the exercise of due diligence should be or may become known by the State to be in the possession, custody or control of the State or in the possession of any person involved with the investigation, preparation or

**MOTION #24**

presentation of this prosecution. This includes but is not limited to:

* 1. chain of custody: The *specific* information requested in paragraph 1 regarding scientific data, reports, records or results, including the names, addresses, telephone numbers of any persons involved in obtaining, transferring, testing or analyzing physical objects or samples collected in the investigation of the alleged crimes, involving any item or any person not already mentioned.

RESPECTFULLY SUBMITTED,

RICHARD S. JAFFE

J. DEREK DRENNAN

BRUCE A. GARDNER

OF COUNSEL:

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P.O. Box 18636 Huntsville, AL 35804-8636 256-533-5756

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing upon the County District Attorney's Office, County Courthouse, 4th Floor, 100 , AL , by placing same in the U.S. Mail, postage pre-paid and properly addressed, and/or by hand-delivery, on this the day of , 200.

Richard S. Jafe