

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss

FRAMINGHAM DISTRICT COURT  
DOCKET NO. CR 00-1893

COMMONWEALTH

v.

MICHAEL ELBERRY

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COMMONWEALTH'S MOTION FOR RECIPROCAL DISCOVERY

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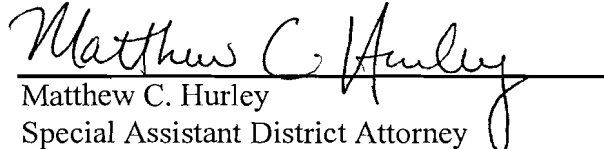
Now comes the Commonwealth in the above-captioned matter and respectfully requests this Honorable Court, pursuant to Mass. R. Crim. P. 14(a)(3) and 14(b), to order the Defendant to provide the Commonwealth with the following:

1. The names, addresses, and dates of births of all witnesses that the Defendant intends to call at trial.
2. Any written or recorded statements made by any witnesses that the Defendant intends to call at trial.
3. Any evidence, documents, statements of persons, or reports of physical or mental examinations that the Defendant intends to use at any hearing or trial in the above-captioned matter.
4. Notice of any defense of lack of criminal responsibility, or defense based on license, self-defense, claim of authority or ownership or exemption.
5. Notice of any prior/subsequent bad acts of any witness on the Commonwealth's witness list that the Defendant intends to use at trial.
6. Notice of any character/impeachment evidence or witnesses that the Defendant intends to use at trial.

As reason therefore, the Commonwealth states that such information is essential to facilitate full disclosure of all relevant facts. See Mass. R. Crim. P. 14(a)(3). The Commonwealth

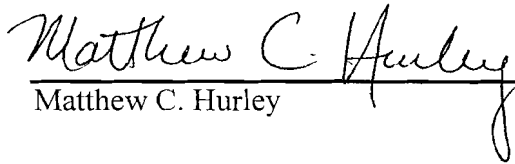
requests that the Defendant supplement his responses to the above requests as required by Mass. R. Crim. P. 14(a)(4).

Respectfully submitted  
For the Commonwealth,  
District Attorney Martha Coakley  
By:

  
Matthew C. Hurley  
Special Assistant District Attorney  
Framingham Regional Office  
100 Concord Street, 3<sup>rd</sup> Floor  
(508) 875-4141

Dated: October 16, 2000

I hereby certify that I served true and accurate copies of the foregoing on the defendant by hand~~/regular mail/facsimile~~ to counsel of record this 17th day of October 2000. Signed under the pains and penalties of perjury:

  
Matthew C. Hurley