

COMMONWEALTH OF MASSACHUSETTS

Middlesex ss

Framingham Dist. Court

Commonwealth of Mass.

Criminal Docket

#0049CR1893A

CR 3006

v.

Michael Elbery

DEFENDANT'S MOTION FOR BILL OF PARTICULARS

The Pro se defendant Motions for a Bill of Particulars regarding the crime alleged in the above docketed action. The prosecution's discovery provided to this defendant does not adequately detail the alleged crime so that the defendant, pro se, can be prepared for trial and defend his case regarding the charges against him.

The Pro se defendant demands as the law requires

1. State how each alleged injury occurred as depicted via the 6 F.P.D. pictures of the alleged victim, Peter H. Gear.
  2. State the number of times the alleged victim was battered causing his each of his alleged injuries.
  3. State any weapons the prosecutor alleges were used to inflict each injury as depicted by the 6 F.P.D. photos.
  4. State how many times each alleged weapon was used causing the alleged
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victims' injuries.

5. State where each weapon contacted the alleged victim.

*Michael Elbery, pro se*

Michael Elbery, Pro se

SECC A 406 C57634

12 Administration Rd.

Bridgewater, Mass. 02324

2-14-01

I the pro se defendant, Michael Elbery, sent this "Bill of Particulars" to the Clerk-Criminal-Framingham District Court, 600 Concord St., Framingham, Mass. via U.S. certified mail<sup>\*</sup>-prepaid and the Framingham D.A.'s Office, 100 Concord St., Framingham the same all on 2- -01 from SECC Prison.

*Michael Elbery, pro se*

\* Sent Clerk - U.S. cert. mail return receipt - 7099 3400 0010 7041 6630  
\* Sent D.A. - U.S. cert. mail return receipt - 7099 3400 0010 7041 6633