

11/23/09

3 of 3 motions

Case No. 09-00043 REL-01

U.S.A. v Clinton D. [unclear]



Motion for ineffective assistance

I the defendant hereby request the courts to grant ^{effective} replacement of ~~court~~ appointed counsel.

If the defendant is in a fiduciary relationship with the other party (attorney and client) he may have the affirmative duty to speak the truth. Sagre v. Mass 84 F.3d 1212 (9th Cir 1996) counsel was found ineffective for not objecting to inadmissible evidence.

Motion for Incamera Review of behind the counter camera evidence

The defendant hereby request the courts to grant all video footage from behind the counter at cricket store the defendant was arrested outside of. Brady v. Maryland 373 U.S. 83 (1963) Due process requires disclosure of evidence upon request where the evidence is material either to guilt or to punishment irrespective of good faith or bad faith of the prosecution. Pennsylvania v. Ritchie 480 U.S. 39 (1987) District court required to review specific documents to determine if they contain exculpatory evidence. U.S. v. Figurski 545 F.2d 389 (4th Cir 1976) material which is exculpatory must be disclosed.

Motion to dismiss with prejudice

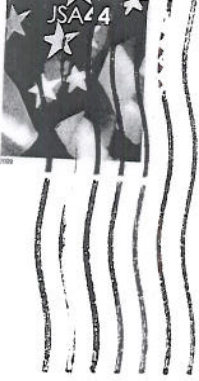
The defendant hereby requests the courts to dismiss charges of bank robbery due to lack of Due Diligence ^{from} for prosecution's failure to provide all camera footage at cricket store (behind counter) therefore the government wrongfully withholds possible exculpatory info

US ex rel. Meritt v. Hicks 492 F. Supp. 99 (D.N.J. 1980) due process requires that exculpatory material be made available. US v. Peters 732 F.2d 1004, 1009 (1st Cir 1984)

Motion to request 17c of Kansas City Police D video evidence.

The Defendant hereby request the Courts to order a 17c for In camera review of all video evidence obtained from cell phone store prior to arrest
 § 2704 Backup preservation provider shall create back up copy consistent with regular business practices of two days

Clinton Taylor 21415045
c/o: 100 Highway 7222
Lawrenceville, Ga 30048



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