

KENNETH VERCAMMEN & ASSOCIATES, PC

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date

PROSECUTOR
c/o MUNICIPAL COURT

Court Administrator
MUNICIPAL COURT

RE: State v
D/O

Summons:

Offense:

REQUEST FOR COMPLETE DISCOVERY

Dear Prosecutor and Court Administrator:

Kindly enter my appearance for said defendant and a plea of "NOT GUILTY". Under Rule 7:6-1b my client waives arraignment and certifies we have received a copy of the complaint, have read it and understand the substance of the charge.

Demand is made that the Prosecutor and Police provide us with discovery pursuant to Rule 3:13-3, Rule 7:7-7(b), OPRA/Right to Know Law NJSA 47:1A-1, Shuttleworth v. City of Camden, 258 N.J. Super. 573 (App. Div. 1992) and Brady v Maryland, 373 U.S. 83 (1963). Please forward to me all documents which you have in your possession or which are in the possession of any law enforcement agency or the complainant pertaining to my client. Unless all requested discovery is received and Evid. Rule 807 is complied with, the defense will make a motion to dismiss all charges and will object to any attempt by the State to introduce evidence at trial. Demand is made for a speedy trial. I serve as Public Defender in Metuchen on Tuesday nights at 6:30 so I request no Tuesday night hearings, if possible. If the Prosecutor has any questions I would be glad to speak with them.

Very truly yours,

KENNETH VERCAMMEN

cc: Client
KAV/