

#159

NOV 17 2014

ANTHONY S. ANTONIOS, ESQ.
CLERK OF SUPERIOR COURT

BRISTOL, ss.

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CRIMINAL #2013-983

COMMONWEALTH OF MASSACHUSETTS

v.

AARON HERNANDEZ

*11/24/14
David. Commonwealth
request all discovery
be provided.
FD/Carla/11*

**DEFENDANT'S MOTION FOR DISCOVERY OF WITNESS
STATEMENTS, REPORTS, OR NOTES NOT PREVIOUSLY DISCLOSED**

Aaron Hernandez, the defendant in the above-captioned criminal case, hereby moves this Court, pursuant to the Fifth, Sixth, and Fourteenth Amendments to the United States Constitution, Article XII of the Massachusetts Declaration of Rights, and Mass. R. Crim. P. 14(a)(1) and (2), to require the Commonwealth to produce forthwith all statements, reports, or notes of the witnesses enumerated below, all of whom appear on the Commonwealth's List of Potential Witnesses dated October 31, 2014. As grounds therefore, defendant avers that after searching the mountain of discovery produced by the Commonwealth to date, undersigned counsel have been unable to locate any statements, substantive reports, or notes respecting any of the individuals listed below. The requested material is essential to enable the defendant to prepare effectively for trial and to cross-examine these prospective trial witnesses.

*11/17/14 Commonwealth's opposition due by
Thursday November 20, 2014. (Garsh, J.) MA*

CIVILIAN WITNESSES

1. Nereida Alicea;
2. Mark Archambault;
3. Edward Brennan, Jr.;
4. Larry Brown;
5. Max Brown;
6. Carlos Ferreira (we have a report stating he was interviewed on tape on 3/26/14, but we do not have the recording);
7. Jose Furtado (we have a report stating that he was interviewed on tape on 4/9/14, but we do not seem to have a copy of that recording);
8. Jody Jenkins;
9. Jean Lorizio;
10. Milian Mitrovich;
11. Zeid Navulsi; and
12. Steve Vujevich.

LAW ENFORCEMENT PERSONNEL

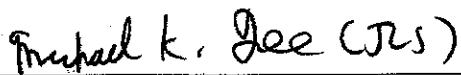
1. Officer Craig Chapman (North Attleboro PD);
2. Detective Ralph Costantino (Providence PD);
3. Lt. Frederick DeMarco (North Attleboro PD);
4. Trooper Catherine Dias;
5. Patricia Furdon (SP);
6. Officer Christiaan Grunewald (North Attleboro PD);
7. Officer Gary Maitland (North Attleboro PD);

8. Officer Kevin McKeon (North Attleboro PD);
9. Officer Kevin Mobley (North Attleboro PD);
10. Detective Lt. Kevin Morrell (Bristol);
11. Detective Steven Pileski (Bristol);
12. Detective Jose Pineda (Brown University PD);
13. Detective David Plascynski (Bristol);
14. Chief John Reilly (North Attleboro PD);
15. Sgt. Jason Roy (North Attleboro PD);
16. Detective Timothy Stanton (Boston PD);
17. Captain John White (North Attleboro FD);
18. Trooper Jeffrey Whitehead;
19. Detective Carlton Williamson (Boston PD); and
20. Officer Edward Zimmer (North Attleboro PD).

Respectfully submitted,

AARON HERNANDEZ

By his attorneys,



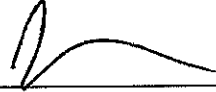
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document upon the Commonwealth by e-mail and by mailing a copy thereof, US mail, postage prepaid, to: William McCauley, First Assistant District Attorney, Bristol County, 888 Purchase Street, New Bedford, MA 02740 on November 14, 2014.



James L. Sultan