

STATE OF NEW YORK  
COUNTY COURT : COUNTY OF ERIE

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THE PEOPLE OF THE STATE OF NEW YORK  
*Plaintiff*

-vs-

JEREMY PERKINS

*Defendant*

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NOTICE OF MOTION  
Ind. No. 00586-2003

*Hon. Shirley Troutman*

PLEASE TAKE NOTICE that upon the annexed Affirmation of JOHN R. NUCHERENO, ESQ., and all of the papers and proceedings heretofore had herein, a motion will be made on behalf of the Defendant, JEREMY PERKINS, on the 2<sup>nd</sup> day of July, 2003, at 9:00 o'clock in the forenoon, or as soon thereafter as counsel may be heard, for an Order directing the following relief:

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I. Discovery pursuant to CPL Article 240 .....	3
II. A Bill of Particulars pursuant to CPL §200.95 [OR §100.45(4) MISD] .....	14
III. Disclosure of material pursuant to <u>Brady v. Maryland</u> , 373 U.S. 83 .....	17
IV. Suppression of statements attributed to Defendant pursuant to CPL §710.30.....	19
V. Suppression of search pursuant to CPL §710.20 .....	21
VI. Time for Hearings .....	26
VII. Inspection of Grand Jury minutes and dismissal of Indictment .....	26
VIII. Disclosure of prior uncharged criminal, vicious, or immoral acts of the Defendant pursuant to CPL §240.43, and a hearing pursuant to <u>People v. Sandoval</u> , 34 N.Y.2d 371 (1974) .....	33

IX. Disclosure of witnesses pursuant to People v. Rivera, 119 A.D.2d 517.....34

X. Disclosure of Rosario material.....35

XI. Reserving the Defendant's right to file additional motions, which may  
be necessary .....35

DATED: June 19, 2003  
Buffalo, New York

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TO: HON. SHIRLEY TROUTMAN  
ERIE COUNTY COURT

**FRANK J. CLARK, III, ESQ.**  
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