

IN AND FOR THE DISTRICT COURT OF _____ COUNTY
STATE OF OKLAHOMA

STATE OF OKLAHOMA)
)
 Plaintiff,)
)
 -vs-) No. CF _____
)
 _____)
)
 Defendant.)

**DEFENDANT’S MOTION FOR DISCOVERY OF MATERIALS PERTAINING TO
COLLECTION, PRESERVATION, AND ANALYSIS OF FORENSIC EVIDENCE**

COMES NOW the defendant, _____, by and through his attorneys of record and requests production of the following materials pursuant to 22 O.S.2001, §2002(d); Daubert v. Merrel Dow Pharmaceuticals Inc., 509 U.S. 579, 113 S.Ct. 2786, 125 L.Ed.2d 469 (1993); Kumho Tire Co. v. Carmichael, 526 U.S. 137, 119 S.Ct. 1167, 143 L.Ed.2d 238 (1999).

SEROLOGY AND DNA

1. Standard Operating Procedure Guidelines for collection, preservation, and analysis of serology.
2. Standard Operating Procedure Guidelines for collection, preservation, and analysis of DNA.
3. PCR protocols.
4. All raw data pertaining to DNA testing performed in this case including, but not limited to:
 - a) gene scan analysis data (hard copies);
 - b) genotyper, genemapper data (hard copies);
 - c) quantitation documentation (autorads or developed blots).
5. Analysts complete case file including, but not limited to:
 - a) notes

- b) correspondence
 - c) worksheets
 - d) peer review documentation
6. Proficiency tests and results for any analysts that have participated in forensic analysis of DNA/Serology in this case
 7. Quality assurance manuals for all DNA/Serology labs involved in collection, preservation, and/or analysis of DNA/Serology labs.
 8. Quality control manuals for all DNA/Serology labs involved in collection, preservation, and/or analysis of DNA/Serology labs.
 9. Resume/curriculum vitae of person involved in collection, preservation, and/or analysis of DNA/Serology.

BLOOD SPATTER EVIDENCE

1. Resume/curriculum vitae of any person involved in blood spatter interpretation.
2. Training manuals used as reference or training for any person involved in blood spatter interpretation.
3. Protocols, procedures, and interpretation guidelines used by any person involved in blood spatter interpretation.
4. Analysts complete case file including, but not limited to:
 - a) notes
 - b) correspondence
 - c) peer review documentation
5. Photos used for blood spatter interpretation purposes.
6. Drawings used for blood spatter interpretation purposes.
7. Proficiency tests and results for any analysts that have participated in blood spatter interpretation in this case.

TRACE EVIDENCE, FINGERPRINTS, SHOE PRINTS, TIRE PRINTS, BALLISTICS,

ARSON, CRIME SCENE INVESTIGATION

1. Resume/curriculum vitae of any person involved in collection, preservation, and/or analysis of trace evidence, fingerprints, shoe prints, tire prints, ballistics, arson investigation, and/or crime scene investigation in this case.
2. Training manuals used as reference or training for any person involved in collection, preservation, and/or analysis of trace evidence, fingerprints, shoe prints, tire prints, ballistics, arson investigation, and/or crime scene investigation in this case.
3. Protocols, procedures, and interpretation guidelines used by any person involved in collection, preservation, and/or analysis of trace evidence, fingerprints, shoe prints, tire prints, ballistics, arson investigation, and/or crime scene investigation in this case.
4. Analysts complete case file including, but not limited to:
 - a) notes
 - b) correspondence
 - c) peer review documentation
5. Photos used for trace evidence, fingerprints, shoe prints, tire prints, ballistics, arson investigation, and/or crime scene interpretation in this case.
6. Drawings used for trace evidence, fingerprints, shoe prints, tire prints, ballistics, arson investigation, and/or crime scene interpretation in this case.
7. Proficiency tests and results for any analysts that have participated in collection, preservation, and/or analysis of trace evidence, fingerprints, shoe prints, tire prints, ballistics, arson investigation, and/or crime scene investigation in this case.

Respectfully submitted,

Oklahoma Indigent Defense System