

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

STATE OF _____)
)
 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); *Brady v. Maryland*, 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215 (1963), the Fifth, Sixth and Fourteenth Amendments to the United States Constitution.

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/STR/mtDNA/ySTR 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);
 - d) Hard copies of electropherograms including peak heights of the alleles.
5. Analysts complete case file including, but not limited to:
- a) notes
 - b) correspondence /communication logs
 - c) work sheets
 - 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.

Respectfully submitted,
