

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION

UNITED STATES OF AMERICA :
 :
 v. : No. [REDACTED]
 [REDACTED] : [REDACTED]

MOTION FOR TRANSCRIPT OF DETENTION HEARING

The above-named defendant, by and through legal counsel, does hereby move this Honorable Court ex parte for an Order directing that a transcript be prepared of the detention hearing held in this matter on March 29, 1994, before the Honorable Russell A. Eliason, United States Magistrate Judge. In support of this motion, the defendant shows unto the Court the following:

1. The trial of this matter is scheduled to begin on Monday, May 16, 1994.
2. On May 11, 1994, counsel for defendant received from the United States a discovery package containing, among other things, a copy of the Grand Jury testimony of Detective [REDACTED] Police Department, the investigation report prepared by Detective [REDACTED] and the investigation report of the North Carolina State Bureau of Investigation, Agent [REDACTED]
3. In reviewing the contents of the discovery package and the notes of defense counsel taken during the detention hearing, numerous discrepancies were noticed in regard to the testimony given by Detective Alston.

4. Defense counsel anticipates cross-examining Detective [REDACTED] extensively concerning the discrepancies in his report and previous testimony.

5. It is essential that defense counsel have a copy of the testimony given by Detective [REDACTED] during the detention hearing in this matter in order to adequately prepare the defendant's case.

6. Without a copy of the transcript of Detective [REDACTED] prior testimony, the defendant will be severely hampered in preparing his case.

7. Defendant requests that this motion and any Order issued pursuant to this motion be sealed.

Respectfully submitted this the _____ day of May, 1994.

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