

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA *
Plaintiff * CRIM. NO. 00-000
vs. *
DEFENDANT *
Defendant *
* * * * *

**MOTION FOR PRESERVATION OF LAW ENFORCEMENT
AGENT'S ROUGH NOTES AND MEMOS**

TO THE HONORABLE COURT:

COMES NOW co-defendant, represented by the Federal Public Defender, and respectfully STATES and PRAYS:

1. The Trial in this case is currently scheduled for March 27, 2001.
2. Defendant respectfully requests that the court immediately order all law enforcement personnel who have worked on this case to preserve and to continue to preserve all notes and memoranda originally prepared by them in relation to this matter, regardless of the conditions of said notes and regardless of whether those notes have been already incorporated into other reports or memoranda which the government intends to turn over to the defendants. Depending on the contents of the same, these notes may qualify as Brady or Jencks material at trial.

WHEREFORE, the defendant respectfully requests this Honorable Court to order the government to advise all law enforcement personnel to preserve their notes and memos.

I HEREBY CERTIFY that on today's date a copy of the foregoing Motion was served on counsel for the Government, U.S. Attorney Guillermo Gil (Attn: Assistant U.S. Attorney

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Michelle Morales) by delivering it to his office at the Federal Building, Carlos Chardón Avenue,
San Juan, Puerto Rico.

In San Juan, Puerto Rico, this March 19, 2001.

Joseph C. Laws, Jr.
Federal Public Defender

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