

COUNTY COURT : COUNTY OF NASSAU
-----X
THE PEOPLE OF THE STATE OF NEW YORK

-against-

AFFIRMATION IN
SUPPORT EX PARTE
MOTION
IND. #

Defendant.

-----X

JEFFREY GRODER, an attorney duly licensed to practice law in the State of New York, affirms the following to be true under the penalties of perjury:

That he is the attorney for the above named defendant, having been assigned to represent him pursuant to Section 18-B of the County Law, and submits this Affirmation in Support of the defendant's ex parte motion for the appointment of a handwriting comparison expert.

That the following is based upon information and belief, the source of said information being the file maintained by this office and the investigation conducted by the undersigned.

The undersigned was assigned to this case on or about ***. The defendant is currently indicted for *** based upon the allegation that he and his co-defendant killed the victim during the course of a robbery.

The undersigned seeks to obtain the services of its own handwriting comparison expert to conduct its own examination of the handwriting and the letter since it is contemplated that the prosecution will have such an analysis conducted.

Due to the seriousness of the charges in this case it is the defendant's position that he must have the opportunity to employ a handwriting expert to examine the letter that was received by the Assistant District Attorney with known handwriting of the defendant.

Therefore, the undersigned would submit that the employment of a handwriting expert is

critical to the effective representation of the defendant in this case.

WHEREFORE, the defendant respectfully requests that grant an order appointing a handwriting expert to the defense of this matter.

Dated: Mineola, New York
June 27, 2001

Jeffrey Groder