***The Stabile Law Firm, LLC*\***

**97 Main Street, Suite 208**

**Woodbridge, New Jersey 07095**

**Scheduling 1-732-602-7795**

**Facsimile 561-330-4207**

Fax

To: Court Prosecutor From: Law Office

Fax: {{fax\_number}} Pages: 4

Phone: Date: {{todays\_date}}

Re: Rep / Adj Letter CC:

 Urgent  For Review  Please Comment  Please Reply  Please Recycle

 Comments:

Please see the following letter.

Thank You

**The Stabile Law Firm, LLC**

97 MAIN STREET

SUITE 208

WOODBRIDGE, NEW JERSEY 07095

**STEVE STABILE, ESQ.\*\*\*\* **

## SCHEDULING: 732-602-7795

## Of Counsel: FAX: (561) 330-4207

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**Hablamos Español – Falamos PortuguêsParliamo Italiano - Nous Parlons Français**

{{todays\_date}}

{{court\_house\_name}}

{{court\_house\_street}}

{{court\_house\_city}}, {{court\_house\_state}} {{court\_house\_zip}}

**Re: State vs. {{client\_name}}**

**Summons/Complaint No.: {{complaint\_number}}**

Dear Prosecutor:

Please be advised our office has been retained to represent **{{client\_name}}** with respect to the above referenced matters.

I hereby request, pursuant to the Request for Discovery, the items be copied or made available for inspection, as pretrial discovery in accordance with the Rules of the court, specifically, R 3:13-3(a) and R 7:4-2(h) and the applicable case law.

It is understood that any discovery not granted may be excluded at the time of trial on the defense counsel's motion. It is further understood that reciprocal discovery will be given to the State in accordance with R 3:13-3(b) only upon written request for the same.

Kindly, advise the amount necessary to cover costs involved in compiling the above information. Upon advising of the amount due, my office will immediately forward payment. Your prompt and considerate attention to this matter is greatly appreciated.

Very truly yours,

/s/ Steve Stabile, Esq.\_\_

The Stabile Law Firm, LLC

Steven Stabile

97 Main Street, Suite 208

Woodbridge, NJ 07095

1-732-602-7795

Attorney for Defendant

-------------------------------------------------X

STATE OF NEW JERSEY,

{{court\_name\_upper}} MUNICIPAL COURT

Plaintiff,

{{court\_county\_upper}}

Summons: **{{complaint\_number}}**

**{{client\_name}},**

Defendant,

REQUEST FOR DISCOVERY

-------------------------------------------------X

The Defendant through his attorney hereby requests the prosecuting attorney to provide his

attorney with the following,

1. Statements as to probable cause. (See Delaware v. Prouse, 440 U.S. 648)

2. Any and all photographs or drawings or video taken or made in connection with this matter as well as an offer of proof as to the authentication of same;

3. Names and addresses of all proposed expert witnesses;

4. Copies of any and all reports of proposed expert witnesses,

5. Names and addressed of all proposed laboratory technicians that may or already

have examined any alleged evidence to be used against the Defendant;

6. Copies of any and all reports of proposed laboratory technicians;

7. Copies of any and all reports of physical or mental examination and of

experiment make in connection with this matter.

8. All records of statements or confessions, whether written or oral, made by this

Defendant;

9. All records or reports of prior convictions of this Defendant, if any, including but not

limited to certified abstracts, proofs of mailings or other official notices,

10. Any and all police reports and or memorandum made including the date and time

said items were prepared;

11. Names and addresses of any person who is known to have relevant evidence and /or any

information, including designation as to which of those persons may be called by the State as

witnesses against the Defendant;

12. Name, and shield number of any police personnel that was present or later showed up at the scene where the Defendant was stopped;

13. All evidence that the State intends to present to establish chain of evidence custody in this matter-,

14. Time, date and place at which it is convenient for my office to examine any tangible evidence expected to be introduced against this Defendant, including but not limited to any video or sound recordings made in connection with this matter by the State;

15. Copies of any official documents which the State wishes to introduce to show the qualifications of any witnesses or the operation of any equipment used in preparation of the State's case including but not limited to licenses, certifications, and calibration records;

16. Any and all evidence not specifically requested above which the State intends to introduce at the time of trial;

17. Name, make, serial number and manufacturers address and telephone number of any radar units used to test the alleged speed of Defendant's vehicle,

18. Before and after tuning fork certifications;

19. Exact location where Defendant's vehicle was allegedly observed in violation of Title 39 or any other law or local ordinance,

20. Before and after speedometer calibration certificates,

21. License abstracts,

22. All evidence pertaining to breathalyzer machine and breathalyzer operators’ credentials

23. Any evidence that the State has in its' possession or has knowledge of which

may be exculpatory to the Defendant.

Dated: {{todays\_date}}

/s/Steve Stabile, Esq.\_\_

The Stabile Law Firm, LLC