

March 11, 1982

Clerk, Circuit Court
for Garrett County
Court House
Oakland, Maryland 21150

Re: State of Maryland v.
Robert Lee Myers
Criminal no. 1735

Dear Mr. Clerk:

I am enclosing herein the following Motions to be filed
in the above entitled case:

1. Motion to Inspect Grand Jury Minutes, and Memorandum in support thereof.
2. Motion to Compel State to Review Procedure by Which it Elects to Seek the Death Penalty.
3. Motion to be Furnished with Statements, Promises, Rewards and Inducements.
4. Motion to Require State to Comply with Rule 772SC
5. Motion to Compel the State to Elect the Theory Under Which a Conviction of First Degree Murder is Sought.
6. Motion for Production of Witness Statements.
7. Motion for Individual Voir Dire.
8. Motion to Compel State to Reveal Homicide Statistics.
9. Motion to Allow Death Penalty Statistics to Become Part of Record.
10. Defendant's Motion for Disclosure of Impeaching Information.
11. Motion to Examine all Evidence in the Possession or Control of the State.

Very truly yours,

AJSK:Sue
Enclosure

Anton J. S. Keating