

(DATE)

(DEFENDANT'S ATTORNEY)

ADDRESS

ADDRESS

VIA HAND DELIVERY

RE: STATE OF LOUISIANA VS. (DEFENDANT'S NAME)
CASE NO. ()

In accordance with the State's obligations pursuant to *Brady vs. Maryland*, 373 U.S. 83 (1963), as well as the Louisiana Rules of Professional Conduct, and as previously disclosed on the record orally, please be advised that State's witness, (WITNESS NAME), was arrested on (DATE OF ARREST) on charge of _____. Additionally, State's witness, (WITNESS NAME), resigned from the (DEPARTMENT NAME) on (DATE) amid an investigation into his role in the (CHARGE).

While this information was previously provided in fulfillment of the State's ethical obligation to the court and (DEFENDANT'S NAME), we have a concern in preserving the integrity of a criminal investigation completely unrelated to the case at bar. Respecting the rights of a State's witness who has not yet been convicted of any criminal offense is also an issue of great significance. For these reasons, the State hereby requests that this notice be used only for the purpose for which it has been provided and that it not be disseminated to any third party. In conjunction with this request, the State has filed a Motion to Seal this notification.

Sincerely,

(ADA NAME)

RECEIVED BY – (ATTORNEY NAME)

STATE OF LOUISIANA
VERSUS
(DEFENDANT'S NAME)
DIVISION "____"

* ____ JUDICIAL DISTRICT COURT
* PARISH OF ____
* STATE OF LOUISIANA
* CASE NO. ____

FILED: _____

BY: _____
DEPUTY CLERK

MOTION TO SEAL

NOW INTO COURT comes (DISTRICT ATTORNEY'S NAME), District Attorney in and for the Parish of _____, State of Louisiana, through the undersigned Assistant District Attorney, who respectfully moves this Honorable Court as follows:

I.

In conjunction with this Motion the State has provided to the defense, and to this Honorable Court, a letter noticing certain exculpatory evidence relative to State's witnesses. The stated purpose of the notification and this motion is to enable the State to fulfill its obligations to this Court and (DEFENDANT'S NAME), under *Brady*, and the Louisiana Professional Rules of Responsibility, while at the same time preserving the integrity of a potential criminal investigation completely unrelated to the case at bar. Respecting the rights of State's witnesses who have not yet been convicted of any criminal offense is also an issue of great significance. To achieve this goal the State hereby moves this Honorable Court to receive and file their letter and motion under seal, and to prohibit their dissemination and exhibition for public view.

II.

The Court has the inherent power to grant the relief prayed for pursuant to C.Cr.P. art. 17, which states in part that judges have "..... the duty to require that criminal proceedings shall be conducted with dignity and in an orderly and expeditious manner...".

WHEREFORE, the State prays that its Motion to Seal be granted and that this motion be filed and kept under seal. The State further prays that its Notice of Exculpatory Evidence also be filed and kept under seal, and that these documents shall not be disseminated or made available for public view.

Respectfully Submitted,

(ADA NAME)

PARISH OF _____

ADDRESS

PHONE #

ORDER

Considering the State's Motion,

IT IS HEREBY ORDERED, that the Motion to Seal is GRANTED;

IT IS FURTHER ORDERED that the State's Motion to Seal and Notice of Exculpatory Evidence shall be filed and kept under seal and shall not be disseminated or made available for public view.

(TOWN), Louisiana this _____ day of _____, 20____.

JUDGE

CERTIFICATE OF SERVICE

This is to certify that a copy of the above named motion has been served on all interested parties by hand delivery this _____ day of _____, 20____.

(ADA NAME)