

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

United States of America,	)	Criminal Number: 5:07-cr-1020
	)	
Plaintiff,	)	
-vs-	)	<u>DEFENDANT'S REQUEST FOR NOTICE</u>
	)	<u>OF THE GOVERNMENT'S INTENTION</u>
	)	<u>TO USE CERTAIN EVIDENCE</u>
Charles Jermaine Keitt,	)	
	)	
Defendant.	)	
_____	)	

Defendant, **Charles Jermaine Keitt** pursuant to Rule 12(d) (2) of the Federal Rules of Criminal Procedure, hereby request the Government to state whether it intends to use as evidence in chief at trial the following:

1. Any statement which the Government contends is admissible as a statement made in the course of and in furtherance of the alleged conspiracy, and which the Government proposes to introduce through someone other than the declarant;
2. Any video, audio, tapes or wire recording;
3. Any statement by any person which the Government contends is admissible against the Defendants as evidence of other crimes, wrongs or acts for the purpose of proving motive, opportunity, intent, preparation, plan, knowledge, identity or absence of mistake or accident.
4. All evidence that is related to, derived from or otherwise the "fruit" of the previous categories.

The purpose of this request is to provide and afford the Defendants an opportunity to suppress such evidence.

JOHNSON, TOAL & BATTISTE, P.A.

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