CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS: PART: **TAP-A**

X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

DEMAND NOTICE FOR DISCOVERY
IND #: 1709/2010

Harry's Nurses Registry Inc.

Defendant.

X

PLEASE TAKE NOTICE, that the District Attorney of Queens County demands, pursuant to Section 240.30 of the Criminal Procedure Law, that within 15 days you disclose to the People and make available for inspection, photographing, copying or testing the following property:

(a) Any written report or document, or portion thereof, concerning a physical or mental examination, or scientific test, experiment, or comparisons, made by or at the request or direction of, the defendant, if the defendant intends to introduce such report or document at trial, or if defendant has filed a notice of intent to proffer psychiatric evidence and such report or document relates thereto, or if such report or document was made by a person other than defendant, whom defendant intends to call as a witness at trial; and

(b) any photograph, drawing, tape, or other electronic recording which the defendant intends to introduce at trial.

PLEASE TAKE FURTHER NOTICE that the District Attorney of Queens County demands that in the event the property referred to herein is not in your possession at the time of service of this notice and subsequently comes into your possession that within 15 days from the time of said possession, you disclose and make available to the People for inspection, photographing, copying or testing any and all of said property.

PLEASE TAKE FURTHER NOTICE that the District Attorney of Queens County demands that within 15 days of the date hereof you specify the particular paragraph of paragraphs of subdivision 1 of Section 250.10 of the Criminal Procedure Law upon which you intend to rely.

DATED: Kew Gardens, New York
August 26, 2010

Respectfully Submitted,

RICHARD A. BROWN
DISTRICT ATTORNEY
QUEENS COUNTY

BY: _____

Rosemary Buccheri
Assistant District Attorney
Economic Crimes Bureau
[redacted]