

(Defendant's name removed)
(Defendant's address removed)

Phone: (Defendant's number removed)
Email: (Defendant's email removed)

(Date removed)

MUNICIPAL COURT OF (REMOVED), COUNTY OF (REMOVED)

STATE OF NEW JERSEY)	SUMMONS No.: (REMOVED)
Plaintiff)	ISSUED: (REMOVED)
vs.)	
)	INFORMAL REQUEST FOR
(DEFENDANT'S NAME)	DISCOVERY
REMOVED))	
Defendant)	
)	
)	
)	
)	

TO THE ABOVE NAMED PROSECUTING AGENCY:

Defendant, charged with a violation of N.J.S.A. 39:4-98, hereby requests disclosure and production of the materials and information for the items below pursuant to Rule 7:7-7 of the Rules Governing the Courts of the State of New Jersey:

1. All police reports made in conjunction with this case.
2. All officer notes concerning this matter: handwritten, audio, electronically recorded or otherwise, including the other side of the citation.
3. All statements regarding this case, oral or written, alleged to have been made by the Defendant, at any time.
4. All names and contact information for witnesses and their expected testimony.
5. All names, contact information, qualifications, expected testimony, and summary of grounds for opinions of any expert witness.
6. All audio or visual recordings of the Defendant, the Defendant's vehicle, the scene, or any other circumstances related to this matter.
7. All tapes, printouts, or other recording of police or dispatch communication regarding this offense.
8. All other favorable or exculpatory evidence, information, and documents, in possession of the Prosecutor, Police Department, or other agency or person available to the prosecution through due diligence.
9. All driving history abstracts allegedly relating to the Defendant.
10. The manufacturers, models, serial numbers, operating manuals, and descriptions of all speed-measuring devices involved in this matter.

11. The repair history, beginning currently and going back 12 months prior to the alleged violation, of all speed-measuring devices involved in this matter.
12. Certifications, installation records, and calibration history of all speed-measuring devices involved in this matter.
13. Certifications of all calibrating devices used to calibrate the speed-measuring devices involved in this matter.
14. All training and operating instruction manuals for speed-measuring devices involved in this matter.
15. A history of the citing officer's training and continuing education on all speed-measuring techniques involved in this matter, who trained the officer, trainer qualifications, and where training took place.
16. The citing officer's radar operator certification.
17. The Police Department's FCC License and authorized frequency band.
18. The citing officer's patrol log and a copy of all tickets written on the day and/or shift of the alleged violation.
19. The maintenance and calibration history of speedometers for all police vehicles involved in this matter only if said vehicle(s) were in motion while measuring speed.
20. The maintenance history of all police vehicles involved in this matter only if said vehicle(s) were used as a power source for the speed measuring devices.
21. The citing officer's written description of the scene or a diagram including location, direction, and speed of all police vehicles.
22. All engineering and speed studies used to set the speed limit at the location of the alleged violation.
23. Any certifications for the use of traffic control signs and devices used to regulate speed at the location of the alleged violation.
24. Citing Officer's cell phone, text, and data records, both personal and business, during the shift in question. Numbers and content can be blacked out. Defense would like to know if the Officer could have been distracted while at work.

Defendant asks to be contacted (preferably by phone and email) with the option to withdraw specific requests for discovery if the copies of documents exceed 500 pages and/or the cost of reproduction exceeds \$25. Thank you in advance.