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June 12, 2007

VIA MAIL AND EMAIL

Brent Davis  
Prosecuting Attorney  
Second Judicial Circuit of Arkansas  
1021 S. Main Street  
Jonesboro, AR 72401

Re: *State v. Jason Baldwin, Damien Echols, Jessie Misskelley*  
Disclosure/discovery

Dear Brent:

This is the second of two letters written this same date. This one addresses discovery, or post-conviction disclosures, in the following areas.

As you know, during the course of our mid-May, 2007 meeting at the Medical Examiner's office, the defense furnished the functional equivalent of reciprocal discovery by participating in a meeting with Dr. Peretti, and furnishing copies of expert reports, some literature, and a number of opinions and statements from experts that were essentially delivered 'live' during the meeting.

I know your expectation was that we would furnish you with the names of experts, and with a description of their opinions, as well as descriptions of any contrary or minority opinions. You indicated that you would also furnish such information. This leads to the first of my current requests, namely, a request for any disclosures pertinent to the opinions regarding causes of death, or mechanisms of injury, to the three victims in view of the opinions divulged to the State by the defense. It would be very helpful to know whether Dr. Peretti has any responses to the information provided to him by the defense experts, or any citations to literature, studies conducted by the Medical Examiner's office, or material assembled by the Arkansas State Crime Laboratory that, in your view, would serve to further illuminate, or undermine, the opinions expressed by defense experts in mid-May, 2007.

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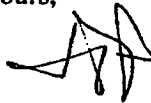
In addition, as we begin the process of preparing to amend any post-conviction Petitions or motions, I am reiterating my request for any post-conviction '*Brady*' material, particularly with respect to evidence presented against Jason Baldwin, including but not limited to the evidence presented by the witness Michael Carson.

During the aftermath of our May, 2007 meeting, you were kind enough to indicate that the West Memphis Police Department had retrieved the photograph of the partial fingerprint, or side palm print, left in the mud. I believe that you were going to furnish a copy of that photograph to the defense. We would appreciate getting access to that print in the near future.

On behalf of the Baldwin defense, I wanted to thank you for your continuing cooperation in this matter, and express my appreciation for your willingness to review the evidence. As part of the process of ensuring that this case gets a thorough post-conviction review, I would appreciate any updates you can furnish me on the topics covered in this letter.

Take care.

Sincerely yours,



JOHN T. PHILIPSBORN

cc: all defense counsel

JTP:sg

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