

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

EDWARD LEWIS BROWN, and
ELAINE A. BROWN,

Defendants.

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Criminal No.: 06-071-SM

**GOVERNMENT’S OPPOSITION TO DEFENDANT’S NOTICE AND MOTION
FOR BRADY – AGURS – GIGLIO MATERIALS (DOC. NO. 92)**

The United States, by and through its undersigned attorney, hereby opposes the defendants’ Motion for Brady – Agurs – Giglio Materials (Doc. No. 92). In support of its opposition, the government states as follows:

1. With the exception of the transcripts of certain non-witnesses which contain no exculpatory information, the government has provided open file discovery to the defendants.
2. Accordingly, there is no exculpatory information as defined in Brady and its progeny that has not been already been given to the defendants.

For the above-mentioned reasons, the United States respectfully requests that the defendants' motion be denied.

Dated: January 7, 2006

Respectfully submitted,

THOMAS P. COLANTUONO
United States Attorney

By: /s/William E. Morse
William E. Morse
D.C. Bar No. 421934
Office of the United States Attorney
53 Pleasant St., 4th Floor
Concord, New Hampshire 03301
(603) 225-1552

Certificate of Service

I hereby certify that a copy of the foregoing was forwarded this date by overnight delivery to Elaine Brown and Edward Brown, defendants, 401 Center of Town Road, Plainfield, New Hampshire 03781.

/s/William E. Morse