## NAVY-MARINE CORPS TRIAL JUDICIARY NORTHERN JUDICIAL CIRCUIT GENERAL COURT-MARTIAL

UNITED STATES	)	GENERAL COURT-MARTIAL
	)	
V.	)	GOVERNMENT RESPONSE
	)	TO DEFENSE WITNESS
JAMES M. ROWE	)	REQUEST
CAPTAIN	) .	
UNITES STATES MARINE CORPS	)	9 December 2011
	)	

- 1. This responds to your Defense Discovery Request dated 8
  December 2011 as well as your Defense Request for information
  Regarding Witnesses sent via email on 6 December
  2011(hereinafter "Request").
- 2. In response to paragraphs 1-6 of your written request, all of the requested information is available via the government's expert witness Dr. Thomas Grieger. Dr. Grieger is available to speak to the defense, and in fact has done so. However, in response to your request:
- a. In response to paragraph 1 of you request, Dr. Grieger testified to the matters inquired about in the cases numbered 108 and 110 in his CV which was previously provided to the defense.
- b. In response to paragraph 2 of your request, Dr. Grieger does not intend to cite any particular study. However, for examples of the types of information he will rely upon, the government will provide sample articles and studies as provided by Dr. Greiger.
- c. In response to paragraph 3 of your request, Dr. Grieger will not be relying upon any particular code or other material within the DSM or related publications to reach his conclusions. Any materials which Dr. Grieger has or will rely upon have been provided to the defense or are available from Dr. Grieger upon interview and request.

- d. In response to paragraph 4 of your request, Dr. Grieger intends to testify that the matters which are counter-intuitive are delayed reporting and continued contact with the accused by Mrs. Klay.
- e. In response to paragraph 5 of your request, all such matters relied upon by Dr. Grieger have already been provided to the defense.
- f. In response to paragraph 6 of your request, Dr. Grieger has produced roughly three pages of handwritten notes which he will bring with him on 12 December for the start of trial.
- 3. In response to your email request for contact information for LT Andria Jones and LT Anne Gilson, that information was provided to the defense in the government's modified witness list with the government's supplemental page 56 matters on 10 November 2011.

P. C. COMBE II

Captain, U.S. Marine Corps

Trial Counsel

I hereby certify that a copy of this document was served, electronically and via hand delivery, to civilian defense counsel and/or detailed defense counsel on 9 December 2011.

P. C. COMBE II

Captain, U.S. Marine Corps

Trial Counsel