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THE LAW FIRM OF PUCKETT AND FARAJ, PC

December 8, 2011

Via USPS First Class Mail

Capt Peter Combe
Trial Counsel
Quantico, VA 22134

Subj: REQUEST FOR ADDITIONAL DISCOVERY IN UNITED STATES OF AMERICA V.
CAPTAIN JAMES M. ROWE

Ref: (a) R.C.M. 701, M.C.M., 2008
(b) R.C.M. 703, M.C.M., 2008
(c) 18 U.S.C. § 3500
(d) Brady v. Maryland, 373 U.S. 83 (1963)

Pursuant to the references, the defense requests:

1. A list of all cases in which Dr. Thomas Grieger has testified as an expert in counter-intuitive behavior in sex assault victims, include jurisdictions, and the name and contact information, if available, of the counsel that retained him.
2. All studies, papers, research, books, articles, seminar materials or any other writing relied upon by Dr. Grieger to assist him in understanding and evaluating counter-intuitive behavior.
3. Identify all codes as organized within the DSM of any disorders that Dr. Grieger intends to rely upon to explain counter-intuitive behavior in Ms. Klay. If he is not relying on the DSM, explain specifically what Dr. Grieger is relying on to reach his conclusions and provide a copy of that material to the defense.
4. Identify the specific behaviors or lack of actions by Ms. Klay that Dr. Grieger concludes are counter-intuitive.
5. Provide a list of matters provided by the Government to Dr. Grieger to assist him in preparing for this case.
6. Please provide any notes, recordings, checklists, documents, summaries, reports or any other work product prepared by, or relied upon, by Dr. Grieger in assessing or evaluating Ms. Klay.

Respectfully submitted,



Haytham Faraj, Esq.