

CIRCUIT COURT  
HOWARD COUNTY

-----X  
STATE OF MARYLAND :

- v - :

H. RAP BROWN, :

Defendant. :

No. 4859 Criminal

-----X  
MOTION TO DISMISS ARSON  
COUNT IN WITHIN INDICT-  
MENT OR, IN THE ALTERNA-  
TIVE, AN EVIDENTIARY  
HEARING

TO THE HONORABLE JUDGES OF THE  
CIRCUIT COURT, HOWARD COUNTY, MARYLAND:

Upon the affidavit of WILLIAM M. KUNSTLER, duly verified the 2nd day of March, 1971, and all the proceedings heretofore had herein, defendant H. RAP BROWN, by his attorneys, respectfully moves this Court for (1) an order dismissing the count of the within indictment charging him with arson upon the ground that said charge was fabricated by the State's Attorney for Dorchester County, Maryland, or was otherwise fraudulently, illegally, unlawfully, and/or unconstitutionally obtained and procured; or, in the alternative, (2) scheduling an evidentiary hearing so that said fabrication may be proved to the satisfaction of the Court; (3) rescinding the order forfeiting his bond; and (4) grant-

ing such other and further relief as may be just and proper  
in the premises.

Dated: March 2, 1971

Respectfully submitted,

WILLIAM M. KUNSTLER  
Center for Constitutional Rights  
588 Ninth Avenue  
New York, New York 10036  
(212) 265-2500

CARL BROEGE  
43 Bleeker Street  
Newark, New Jersey  
(201) 622-4545

HOWARD MOORE, JR.  
Moore, Alexander & Rindskopf  
Citizens Trust Co. Bank Bldg.  
75 Piedmont Avenue, N.E.  
Atlanta, Georgia  
(404) 525-8372

HAYWOOD BURNS  
National Conference of Black  
Lawyers  
112 West 120th Street  
New York, New York 10027  
(212) 663-3700

HAROLD EUCHMAN  
Tower Building  
Baltimore St. & Guilford Avenue  
Baltimore, Maryland 21202  
(301) 752-3626

Attorneys for Defendant