

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

---

LARRY DECORLEON BROWN,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF NEVADA,  
COUNTY OF CLARK, THE  
HONORABLE VALERIE ADAIR,  
DISTRICT COURT JUDGE – Dept. XXI

Respondent,

and

THE STATE OF NEVADA,

Real Party in Interest,

No. 80094

(DC. No. C-17-32471)

Electronically Filed  
Nov 27 2019 11:54 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**SUPPLEMENTAL APPENDIX TO PETITION**  
**FOR WRIT OF MANDAMUS**

**ATTORNEYS FOR PETITIONER**

MONICA R. TRUJILLO

Chief Deputy Special Public Defender  
Nevada Bar #11301

JEREMY W. STORMS

Chief Deputy Special Public Defender  
Nevada Bar #10772

JONELL THOMAS

Special Public Defender  
Nevada Bar #004771

Clark County Special Public Defender  
330 South 3rd Street

Las Vegas, Nevada 89155  
(702) 455-6265

**ATTORNEY FOR RESPONDENT**

STEVEN B. WOLFSON

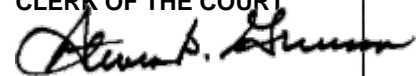
Clark County District Attorney  
Nevada Bar #001565

Regional Justice Center  
200 Lewis Ave.

Post Office Box 552212  
Las Vegas, Nevada 89155

(702) 671-2500  
State of Nevada

<u>VOLUME</u>	<u>DOCUMENT</u>	<u>PAGE NO.</u>
1	Order Denying Defendant Larry Brown's Motion in Limine to Preclude the State From Presenting as Evidence Specific Items Recovered from the Search of Angelisa Ryder's Residence on March 20, 2017 (11/27/19).....	SUPP APP 1-2
1	Order Denying Defendant's Motion to Declare the Court's Order Finding that the State May Present Footwear Impiression Evidence to the Jury Through Lay Witnesses Void as it Violates Mr. Brown's Due Process and Fair Trial Rights (11/27/19).....	SUPP APP 3-4
1	Order Reserving Ruling Until the Time of Trial for the State's Motion in Limine to Address Cellebrite Testimony Pertaining to Advanced Proprietary Software, and the Defendant Larry Brown's Motion in Limine to Preclude All Cell Phone Information Obtained by Cellebrite and Response to State's Motion in Limine (11/27/19).....	SUPP APP 5-6



1 **ORDR**  
2 JUDGE VALERIE ADAIR  
3 Eighth Judicial District Court  
4 Department XXI  
5 Regional Justice Center  
6 200 Lewis Avenue  
7 Las Vegas, Nevada 89155

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

LARRY DECORLEON BROWN,  
#8376788

Defendant.

CASE NO: C-17-326247-1

DEPT NO: XXI

**ORDER DENYING DEFENDANT LARRY BROWN'S MOTION IN LIMINE TO  
PRECLUDE THE STATE FROM PRESENTING AS EVIDENCE SPECIFIC ITEMS  
RECOVERED FROM THE SEARCH OF ANGELISA RYDER'S RESIDENCE ON  
MARCH 20, 2017**

THIS MATTER having come on for hearing before the above entitled Court on the  
29th day of October, 2019, the Defendant being present, represented by JONELL  
THOMAS, Special Public Defender, through WILLIAM J. STORMS and MONICA R.  
TRUJILLO, the Plaintiff being represented by STEVEN B. WOLFSON, District Attorney,  
through JOHN GIORDANI, and the Court having heard the arguments of counsel and good  
cause appearing therefor,

///

///

///

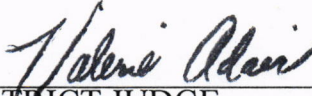
///

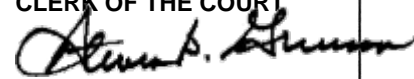
1 IT IS HEREBY ORDERED that Defendant Larry Brown's Motion in Limine to  
2 Preclude the State from Presenting as Evidence Specific Items Recovered from the Search  
3 of Angelisa Ryder's Residence on March 20, 2017, shall be, and is GRANTED IN PART  
4 AND DENIED IN PART AS FOLLOWS:

5 IT IS HEREBY ORDERED THAT THE MOTION IS GRANTED AS  
6 UNOPPOSED with respect to the brass knuckles.

7 IT IS HEREBY ORDERED THAT THE MOTION IS DENIED with respect to the  
8 Ralph Lauren Polo Shoes. After reviewing a photo of the sole of the Ralph Lauren shoe,  
9 which the State intends to present to the jury, with the photo of the bloody footprint, the  
10 Court finds that this evidence is more probative than prejudicial and that the jury may  
11 compare the photo of the shoe with the photo of the footprint to determine whether they are  
12 consistent as this is within the skill and comprehension of the ordinary juror.

13  
14 DATED this 27<sup>th</sup> day of November, 2019.

15   
16 \_\_\_\_\_  
DISTRICT JUDGE



1 **ORDR**  
2 JUDGE VALERIE ADAIR  
3 Eighth Judicial District Court  
4 Department XXI  
5 Regional Justice Center  
6 200 Lewis Avenue  
7 Las Vegas, Nevada 89155

8  
9  
10 DISTRICT COURT  
11 CLARK COUNTY, NEVADA  
12

13 THE STATE OF NEVADA,

14 Plaintiff,

15 -vs-

CASE NO: C-17-326247-1

16 LARRY DECORLEON BROWN,  
17 #8376788

DEPT NO: XXI

18 Defendant.  
19

20 **ORDER DENYING DEFENDANT'S MOTION TO DECLARE THE COURT'S**  
21 **ORDER FINDING THAT THE STATE MAY PRESENT FOOTWEAR**  
22 **IMPRESSION EVIDENCE TO THE JURY THROUGH LAY WITNESSES VOID**  
23 **AS IT VIOLATES MR. BROWN'S DUE PROCESS AND FAIR TRIAL RIGHTS**

24 HEARING DATE: 11/21/19  
25 HEARING TIME: 9:30 A.M.  
26

27 THIS MATTER having come on for hearing before the above entitled Court on the  
28 21st day of November, 2019, the Defendant being present, represented by JONELL  
THOMAS, Special Public Defender, through WILLIAM J. STORMS and MONICA R.  
TRUJILLO, the Plaintiff being represented by STEVEN B. WOLFSON, District Attorney,  
through JOHN GIORDANI, Chief Deputy District Attorney, and the Court having heard the  
arguments of counsel and good cause appearing therefor,

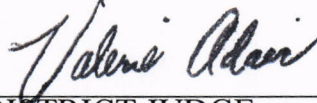
///

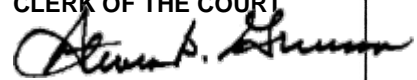
///

///

1 IT IS HEREBY ORDERED that Defendant's Motion To Declare The Court's Order  
2 Finding That The State May Present Footwear Impression Evidence To The Jury Through  
3 Lay Witnesses Void As It Violates Mr. Brown's Due Process And Fair Trial Rights, shall  
4 be, and it is DENIED.

5  
6 DATED this 27<sup>m</sup> day of November, 2019.

7   
8 \_\_\_\_\_  
9 DISTRICT JUDGE  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



**ORDR**  
JUDGE VALERIE ADAIR  
Eighth Judicial District Court  
Department XXI  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

LARRY DECORLEON BROWN,  
#8376788

Defendant.

CASE NO: C-17-326247-1

DEPT NO: XXI

**ORDER RESERVING RULING UNTIL THE TIME OF TRIAL FOR THE STATE'S  
MOTION IN LIMINE TO ADDRESS CELLEBRITE TESTIMONY PERTAINING  
TO ADVANCED PROPRIETARY SOFTWARE, AND THE DEFENDANT LARRY  
BROWN'S MOTION IN LIMINE TO PRECLUDE ALL CELL PHONE  
INFORMATION OBTAINED BY CELLEBRITE AND RESPONSE TO STATE'S  
MOTION IN LIMINE**

Hearing Dates: 10/29/19 AND 11/21/19  
Hearing Time: 9:30 A.M.

THIS MATTER having come on for hearing before the above entitled Court on the  
29th day of October, 2019, and 21st day of November, 2019, the Defendant being present,  
represented by JONELL THOMAS, Special Public Defender, through WILLIAM J.  
STORMS and MONICA R. TRUJILLO, the Plaintiff being represented by STEVEN B.  
WOLFSON, District Attorney, through JOHN GIORDANI, Chief Deputy District Attorney,  
and the Court having heard the arguments of counsel and good cause appearing therefor,

///

///

///

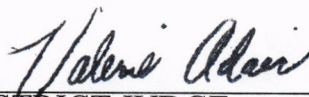


1 IT IS HEREBY ORDERED that State's Motion In Limine to Address Cellebrite  
2 Testimony Pertaining To Advanced Proprietary Software, and Defendant Larry Brown's  
3 Motion In Limine To Preclude All Cell Phone Information Obtained By Cellebrite And  
4 Response To State's Motion In Limine, shall be, and it is RESERVED FOR RULING AT  
5 TRIAL.

6 On October 29, 2019, the Court heard argument on both the State's and Defense's  
7 Motions in Limine pertaining to Cellebrite. The Court ordered its ruling reserved until the  
8 time of trial. The Court further ordered a sealed evidentiary hearing with the Defendant, his  
9 counsel, the Deputy District Attorney, the Cellebrite attorney, and Cellebrite analyst to take  
10 place outside the presence of the jury at the time of trial. After the analyst is questioned by  
11 counsel for the State and Defendant, and the Court has heard arguments of counsel, the  
12 Court will determine if the information sought to be protected is relevant,  
13 confidential/propriety, and whether its exclusion before the jury will prejudice Defendant  
14 and/or impact his rights in any way.

15 On November 21, 2019, the Court entertained further argument from counsel and  
16 ordered that the Cellebrite analyst will, at a minimum, be required to testify at trial before  
17 the jury as to the chain-of-custody of the cell phone and steps taken to retrieve the evidence  
18 from the phone.

19  
20 DATED this 27<sup>th</sup> day of November, 2019.

21   
22 \_\_\_\_\_  
DISTRICT JUDGE



## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on the 27<sup>th</sup> day of November, 2019, a copy of the foregoing Supplemental Appendix to Petition for Writ of Mandamus was filed with the Nevada Supreme Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Clark County District Attorney's Office  
Regional Justice Center  
200 Lewis Ave., 3rd Floor  
Las Vegas, NV 89155

I further certify that on November 27, 2019 a copy was mailed to the following:

The Honorable Valerie Adair  
Eighth Judicial District Court, Department XXI  
Regional Justice Center  
200 Lewis Avenue, 11C  
Las Vegas, Nevada 89101

**RESPECTFULLY SUBMITTED:**

/s/ W. JEREMY STORMS

---

W. JEREMY STORMS  
Nevada Bar #010772  
MONICA TRUJILO  
Nevada Bar #11301