

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CALHOUN COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2014- 002131

Mikal D. Mahdi, #5238

Petitioner,

v.

State of South Carolina,

Respondent.

APPENDIX

Vol. XXV of XXVIII

Seth C. Farber (*pro hac vice*)
Winston & Strawn LLP
200 Park Avenue
New York, New York 11006
(212) 294-4611

Anthony Mabry
Assistant Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3665

Brandon W. Duke (*pro hac vice*)
Winston & Strawn LLP
1111 Louisiana Street, 25th Floor
Houston, Texas 77002
(713) 651-2636

Attorney for Respondent

Teresa L. Norris
Blume Norris & Franklin-Best, LLC
900 Elmwood Avenue, Suite 101
Columbia, South Carolina 29201
(803) 765-1044

Attorneys for Petitioner

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**DEFENDANT'S
EXHIBIT**

March 19, 2006

CP 7 39-11
104 LD**NOTES CONCERNING THE MIKAL MAHDI CASE**

1. Mikal and his brother were split up when Mikal's father ~~attacked~~ ^{attacked} Mikal's grandmother and beat her. She in return called the police and had him arrested. The oldest boy went to live with an aunt in Texas. Mikal was sent to his uncle Carson.
2. Uncle Carson's family consists of three (3) children and his wife. Mikal's uncle thought he was a demon and conflicts did occur. There was such an incident when Mikal's aunt beat him and Mikal called the police. The beating was described as his aunt beat him with a belt, and then she took a break and then beat him again. When the police had arrived, Mikal had taken some ashes and placed on the areas of the beating. Mikal told the Police at that time, he wants to kill himself and asked for the officer's gun.
3. Mikal was told at an earlier age that his mother was dead but found out later that she wasn't. Mikal's thinking that he was the fault of the separation.
4. Uncle Carson feels that the only reason for the defense is because "Whites" have a complex because of past racial situations.
5. Uncle Carson feels that his mother is a "bitch" because she never cared for the children's only appearances. For an example she would get in front of a mirror every morning and make a presentation of how she would approach people.
6. Apparently there are a lot of psycho problems and attitudes throughout the family.

SUGGESTIONS:

1. Obtain grandmothers' children's addresses and visit.
2. Talk to Carson and his family and their children
3. Talk to Mikal's aunt in Texas

These notes are based on a conversation with Janet Holahan on March 17, 06 in Myrtle Beach, SC

Madhi, Mihal

F/U Inman

02-03-06

extended case to mid day
Calhoun Co.

KCI / Max security

815-

Starting
Dec 05

? 4 testing = McKee? MMPI, WAIS etc.
? paranoid ideas? 2nd development vs. del or forensic
having always to look out for self, & help, & trust
& healthy interpersonal rel

* focus on mind set during offense (p. 3 notes) - perceptual

P4th

product of 6 as youth?
L or P. D/O as adult?

- paranoia
- how he was
cop?

Cor bx

school

P4th - 0

employed

subit - 0

PM HX - NKDA MMPI & PK

rel development

CR 104
8
3-1-11
DEFENDANT'S
EXHIBIT

DOB : Redacted
SSN :
SCDC # n. inmate # :
age
marital : S

Opportunity? - maybe & only an arrangement pled NG
& statement

(7)

4 son

good
influence

B/K Petersburg VA / Lawrenceville, VA youth
intact until age 6, 10, sep. w/ - AA, supervising job / truck
split 2° for extended - work

bro - Salem older by 1 year. good rel.
idle / cigarette = older bro, made it cigarette in youth
↓ got need protect, mutual.

"practical, brains, wise, good advisor, mentor
for bed me wrong" - life made for bitter, negative,
unemployed "you'll never get anywhere" just the world, "just
get down," "suggestion of it, & be successful."

& real carrier as youth, easy to get along w/
friends, popular for wrong reasons - "fight & talk juke"
↳ "being cool"

& real trouble in elem school & couple fights => susp
miss school / truant - "wouldn't go, @ bus stop, &
a few others or along", avoid causing problems,
play ball
pretty good student in elem.
class clown

& fail in elem school, grades were low 2° complete
spec. ed 2° & down, & using potential assignments
↳ 5th grade, beh. prob.

work was too easy, became ODD & teachers
assumed it was "stupid" - V esteem / frustrated
wasting time in school => & go

& learn anything valuable or what I need as adult
teachers - self fulfilling prophecy
became angry & teachers - disrespect => truant

★

repeated FS 136 2° 6th grade

boxed principal to
take him out of spec. ed. ↳ delayed spec. ed entrance

(2)

of real student 10 yr in elem school

by middle school

detention for missing teachers 6th grade

dropped out in 6th grade, spec. ed. age 11 1/2

pt believes school kept him in spec. ed for the 8

destroyed pt's future for college
feet of support from school system

P dropped out 6th grade, stayed in for who of support getting
out of spec. ed. degrading, humiliating, observed
"what I did didn't matter anyone, e.g. 100 on tests;
do good & wear a G.D. thing
hated the other rec'd. rather good grades

for attempted home school to avoid DSS

"I learned alot" "unconventional education"

★ denied any P/R abuse → aunt (cousin's spouse)
↳ may have been abused & denied 2° shame

P dropped out, bug out; somewhat social until age 16
be alone when "bin up to something" illegal usually alone

between ages 14-16, learned that people are "unreliable"
people do things to benefit themselves

"I was raised to be paranoid & leave of every body"

home school - for taught militant, paranoid views of
perceptions, politics & b.x, pessimistic attitudes,
for taught how to fight
for home school (B) boys.

as pt grew up, pt saw the pessimism & paranoia
for taught, e.g. pt's friends on bikes in wrong
neighborhood, picked up by police
↳ same middle class.

he dropped
out of school

pt of him
why???

if in each neighborhood, its ok to kill each other
only one if white folk killed.

Nicholson, VA
low soc. age 17, pt attempted to ^{AA} up 2 females fight & gets
neighborhood stabbed by few more, goes to police station & they
help while bleeding there. → canadian
? if report pt & write / sign a statement
was filed fueled his fa's teaching of racism

only a naive / vulnerable person would do it.

in prison 2 1/2 years ^{AA}
assaulted male inmate - look-bead. P inmate took
phone from pt
& he reported it

pt is co-defendant, tried to rob canadian / rip prison sale
with? for the \$, fuel the penetration
later learned it hurt other inmates, they took the commission
so stopped messing up that would hurt his peers
or to himself

^{State}
transferred to Wallens Ridge Penitentiary in VA
"best", about 98% same inmates all minority pop.
max sec. try to behave since on 2 1/2 sent. started
to mature in prison.

worse = "extreme abuse of power, institutionalized racism"

Nation of Islam = gang

KKK = political group

Neo-Nazi 57

} came on 15% of pop.
more freedom in yard

originally
of his
house,
then our
place duplex
alone

CO "beat down time" (P) abuse of inmates
judicial punishment & fair & inmates in favor of cause pgs.
occasional fights @ this prison & colleagues
shot in back & rubber pellets, look down
"victim of beat down time"; admin. hazard, bad influence
then released aged!

waiting for bus to Richmond; found that cause people
outside & bad as in prison
bought combat knife for protection

signed to go to Lawrenceville, VA to start probation
figured Saw would have an expulsion
with tried to be (+)

created bad situation to have contr. job - don
↳ excess work but enough \$ to get by
↳ competed & illegal immigrants

started selling weed & cocaine
planned to rob a cocaine dealer & resale cause.
↳ like a business plan

robber went bad - "I had a combat knife"
it solicited friends to help & robbery
pts' friend & pistol, pt & knife
& short gun

rented a car

dealer had a 45 on his hip, wrestled & dealer
gun shot floor of car
pt stabbed them 4-5x's lungs

got 9a powder cocaine ~ \$5000 - \$13,000

then shot dealer in head & his own gun - dead (5)
4x's

kept shouting "I was renewed," but knew he was dead.
in Brunswick (I want people tortured)
County, VA ✓ I took, food, clothes, weapons, took some clothes
& credit cards, sent cell phone
wiped down car from prints. collected brass
dragged body in woods as friends ran off
ditched the car

met up & friends @ rental car
burned his clothes, washed up in river
destroyed evidence

I was before people found body
pt believed came dealer "sell drug to black
community, yet we did it too"

a form of "genocide" — B.T.
one friend took off & ran away, pt found him
pt had his knife

pt found his other friend Anthony - pulled around
③ found other friend in parking lot, knife to his neck
in a van (parking lot), wanted his take
only got \$1200 for the 2 of them

June 2004 B.T. bought huge house & was arrested & said together

(see 1st note p. 3)

became more paranoid, bought books on how to
protect self, militant, camouflage
alone, ② Anthony; robbed Nate → ran off,
& ③ his preg girlfriend => dated her (she's now)

(from 1st note p. 3)

thought cabin was abandoned, & trucks, & inhabitants

owner - & think he was an owner as he's have a key

⑥

actually to himself

so he seemed to have dx in; thought he was talk to someone
& see him until face-to-face

intent
to kill

grabbed 22 upls semi auto

perceived
self-defense

wanted
to get up
& take
truck

T. Bent / shots 40-50% & know him
came 6:00 healthy

put hands up, victim tries to take off
seemed like guy was going for a gun in his shirt

& know he was cop
shot 6x for head

still breath shot once in head / chest to stop
heart from pumping blood & make mess
think about dignity of body

victim cursed, screamed, yelled somebody's
name (pt thought sure was outside)

& begging

pt learned victim & have gun, only caught & hit
pt took it

"I didn't have to shoot him"

"I could have chased him & hit"

if & shot him, feared he'd be shot

learned he was a cop from lights inside truck

- took truck => FL

"feels it was wrong" yet "he & fuckin' me"

pt thought he was going to kill him

set build as fire fled scene in truck, hit tree x 2
caught & p MVA pt & they followed him
pt parked & talked in other vehicle

(2)

other veh calls police on cellphone
passenger phyll stopped him from leaving when
attempts to get away it r/c

pts & prepared, wearing the bullet vest & goggles
& swim suit Satellite Beach near NASA
cops trailed him
released truck & out from cops
& resist arrest

"I was justified" "great leaders were mass
murders" "people only understood force"

DST/CR/CTC ✓ incl plea bargain

"Society's main goal is to execute me, to instill
fear in the pop."

"I deserve to be executed"

→ "I tried to raise up against the state,
unsuccessful" => execute them

"I needed to use force to gain independence."

"I want society to be bent on me, I wouldn't
do it for them"

"swift execution"

< "the more dylomatic now"
more mature

"I love life" remains life - going to decide
& want plea bargain - I trust

MSE APOX

mlktr

"fumbled out

chilled from

Q4m Q4m 5

Q 5/11

Mabdi

Intake

12-30-08

SMU

PCH

age 9 1/2

Kalto, MD ambulance

trouble @ school

placed there by fa

MHC eval

? results

& sure why he lived in them

2-3 fights @

close to fa

& in school, 1st swing

easily provoked, short fuse,

for angry outburst

& counseling, returned to school

& found fighting

Ø 4/4

Lawrence suffered silent substance abuse

age 21 * ETOH - self med, wrong paranoid, overwhelmed & stress

just for a buzz / numb & sloppy drunk

worst

usually alone

brown liquor

& trouble

stress =>

stress from P.O.

threats of violation repeatedly

"f - om", tremor, reclusive, 7 ETOH

works under hardpan work.

F4H

fa's family & ETOH

mf " & ETOH

fa depression, paranoid / conspiracy theory

Ø 4/4

Legal H

VA

age 14

B&E

& violent crime

mixed with, wrong persona

for

show up

for

front camp give details & report

repeat DDO in missing report

argy that this record could follow him

(YA)

victim was drunk, attempted to stab pt's new driver
age 18 fight, stabbed victim, screw driver down his back
plead guilty "attempted murder" => "walkman would be"

of feel guilty, remorse, sympathy "he deceived it, he attacked me"
as victim brought it on himself sent 2 1/2 years ^{the way} ^{original} earned GED adult learning

like "Oz" read alot of books tried to look up to pt - became disinterested
(see p. 4 - 2nd notes) high racial persecution, breeds militance



were suspicious "paranoid" of them, feared police
couldn't read people, felt interpersonally helpless
"if someone petrifies my I'm going to hunt em"

employed as Exec. counter worker, conscientious

of close friends

more of a loner, introverted

"one to protect me"

easily intimidated, feared police, pt brought guns

"one wants me, I gotta defend myself, police are
out to kill me, I'm going to kill them."

reflected on being great leaders who let people fuck 'em

"I have to demand my right to live, even by deadly force."

"I try to be diplomatic" "knew that police plan to shoot me
down."

he wants to invest in another, brought guns / rifle (body gun
< shorty guns sure are 9 shot > easy to conceal

"defend myself from
being a victim of police"

"night makes right"

underoffense
age 21

Jul 2004 "Kiddie" DRK or BTDH

"sleep deprived" I was sitting } paranoia
tired, ant's attacks "paranoia" } "wonder"

"I was a target" - everywhere "but losing it"

it fired a
weapon
the killer

thing of master jobs, for \$

probable needed \$
L > hustled RX around the

"invests power in myself" since US government does the same.
saw a man dead R/ transaction, it witness, shooter.

other people alleged he wasn't trigger man

he was an error 2° report

"writing to be the law ant & his deal"

at head BT
was snitching
so fed to
with female
detectives

it was suppressed by but followed by police

needed to leave town, would hustle R/ etc.

stole a vehicle, planned to steal car to leave VA

threw his gun away

Auth go
got
directed

stole car from dealerships; car broken in SC on way to FL

VA, felt free, paranoid, & being watched

"strong why I can't live like anyone else"

\$10, so can pick up car & hand gun - & plan to kill the owner of Expedition

tried used credit card for gas

red shah/news, D car for woods - ? how often he was.

abandoned hunting cabin, veggies in garden

feared staying @ cabin if owner should return & kill it &

threw him in woods.

album
Curtis
40%
show the
area

many large deer stand / lay down in woods

mosquitoes so went to cabin again

slept; someone came to cabin ~6:30 AM

2 room
cabin

had 2 guns
1 revolver

"in rural areas everyone carries a weapon" - owner could

kill him if he ran, so he stayed / hid & waited
to fight; original intent to tie guy up, but guy ran
from pt messing in his shirt (thought getting a gun)
pt started shooting at ~~the~~ rifle in the cabin

owner did turn around & pt thought self defence

when saw him pulling @ his shirt "I don't

want to hurt you" Victim screams & then panicked

pt, & sure if victim was alone; guy was dead

pt kept firing 2° vit & fall, #15 shots

dropped vit back into cabin & attempt set fire

turned on water & he went to vent. & got diesel

fuel, burning slow

"oh my god 2° "I know I would have an escape"

also had a shot out of police."

- Driver truck down road, cops pass then turns around - Bluelite, MM tries to load gun & getting prints on bullets (used oiled rag he wrapped gun in to keep it from rusting) while driving high speed.
- Other cops start following him - he eventually stops - gets out - throws gun & hands up then runs to get someone nearby for boat - 300 Yards far from Cuba - still in swim trunks - legs cut up from plants/cacti as runs.
- Hides while sees cops trying to find him - plans to wait til dark (nearly 7 PM June 2004)
- Hears cops sees lights, copter - sees some cops Tager & dog who stopped him before got Tager @ him again
- MM arrested
- Refused to make statement - Recall Mr Righits read
- Says he seen Mr Grant 215X & says he good lawyer.

1/25/06 10170 CARRYMAN
BRIGHT

- Paige sz MM in Baltimore Tx Cntr & Tx dte experimental psychotropics 93-94 ^{ADH}
- CG sz MM has pending (AR/M) charges from NC (on way to Tampa) involving convenience store clerk - action surveillance tape
- Paige & Maryon H spent 2 sessions ~ 4h each.
- Paige sz @ possible crack
- CG asks for IQ (Neuro & Cog)
- @ Vera Mahdi in Richmond VA
- CG wants to do H trial in Jan 07 - Sol sz wants go in May but will accept the Sept
- I suggest ADHD (STV) → CD → ASPD
- m. crack baby - rec pediatrician > WMK 232-235
- ADHD = Tx in early 90's - rec pediatrician child

↑ predictability
↑ developmental damage
↑ development cocaine withdrawal
↑ 2000 psychiatric cocaine withdrawal
↑ 2000 in F. L. hospital
↓ attachment
↓ expressive/receptive
↓ abnormal neuro. exams
@ 2nd delusional prob. b/c
Crack/Marijuana
- looking for evidence
- use for interpretive coping
memo

3/29/06 Paige in Phila on case. Carl & Maryon. Milwaukee (CG offered)

Paige summary (FAM)

- m. & M. Bidwell - told lot of MM about H - sz @ need to try to be white & M. Walters
- (MM crack baby)

help ^{me} ~~know~~ bill me. Charge ~~getting~~ ⁱⁿ - guy ex cap - got PB to 30y suspended to 3y
- I shot a stupid - shot & he beat it - wrote told diff stories - his blood etc - making a winding
L agg assault.

8-16-17 - I met ~~DN~~ ^{DN} ~~whit~~ ^{me} ~~sucked~~ ^{more} ~~than~~ ^{him}. A GED I went to James Comm
College - so I ax him ab it so I N be ignorant or I N be swindled.
E blew it off. When I went get VL but he promise but N do - he got friend
also when he sign me to speed - I guess so I N do bth than him.

In VJ I read alot @ Library then @ Pen. read alot of revolutionary/political
books - I V what I see things - I order books to make bombs/silencers I surprise
it got by but they only look @ cover & publishing company on approved list
A Pen I in VA - he in Phila. When I R he run at Black Power.

I b e name E gave me DN change it.

A Pen I N self destruction rather than sell drugs to people - I want long.
- I learned leadership skills & how to persuade people - I take charge & got known
as go to guy when things got tough. I didn't get tired - Pro. suggest I V Army - recruit
me. I N put down I changed felon. When I (17) E tell me sign v some but I N
wait to guys yell @ me - I had shot to Boot Camp.

- I tried get job in chicken tender / Boars Head but they hire illegal immigrants
but I realized I didn't get job as felon.

- (also/dot) @ ~~PT~~ ^{PT} cuz not so bad but I was slow - I want a representation
I get fuck - I in apt 5 furniture

- start sell crack & other guy sell crack & meth - we some force him to make meth
- we go to rob but guy shot back hit in leg - I just there not fuggerman
but guy got killed - one guy there told his girlfriend that naps - was a 19k of
drugs - we drove off car broke down - we had all our bloody shirt / pants
spikes messed up I didn't know what to do - I scared I didn't know what to do
heart beating (cuffs) - I took a gun but I don't / buried shits (etc) - I get bk
& guy X since clean & he disappeared - he told girl I shot his friend body - rumor
circulated community - I was get but other guy there & get big car 19k - we found
him cuz he gonna buy house! I dropped in who. Blue and him for drugs that
about 5 other guy who call me say BJ telling to homicide cops - I K time to go - I go Tampa
where friends were - they send me pc phones of Ben's & P - I K VNH X go by bus

- 2 people d. e some weapons - so we getting hot. made there L 1/yr.
- 2 probation officers on me 1 day - SX came by 11-12 mid - write search house
I get fucked cuz had a gun in closet & had 45 on waist I T didn't shoot him / get rid of body.

- I never big in drugs except a construction jobbing & shit - SX been good on Em porch
got me thru hard day of manual labor - got it only I interested - I don't interest in P
a beer then brown liquor - I don't drink / drive cuz is in hood - I don't sell if hit P.
I drinking / drink again - I shot to some you cannot see guns & short s.d. - I don't sell all
but bottle of Camo in that & I got to drink to more.

- I get a word a etc - I really a prison - I boxed in prison. - I had some V N build
I ab bombs but I got P & I ab them

- I come / crack, PIV, P meth, P miralants, P bars, P L E D.
- I leader in community - guess ask me ab this / that lots
of pressure.

- I don't want to shoot them.

DEFENDANT'S
EXHIBIT

34-11 10 04-164
LD

NOV-7-2006 01:26P FROM: MCNAIR GRAHAM

8037652105

TO: 18035313628

P.2

PAIGE MUNN TARR MITIGATION SERVICES

1333 SINKLER ROAD
COLUMBIA, SC 29206
(803)782-6000 (803)269-9858
paigetarr@sc.rr.com

November 6, 2006

Glenn Walters, Esq.
P.O. Box 1346
Orangeburg, SC 29115

Dear Glenn,

This letter will serve as a notice, as well as an update for the status of the mitigation investigation in the case of SC v. Mikal Mahdi. I have spent approximately 170 hours interviewing witnesses, collecting documents and producing data in my quest to put together an adequate mitigation presentation at the sentencing phase of Mr. Mahdi's death penalty trial. I was initially allotted 100 hours to begin my investigation and was told by previous counsel to continue working after the initial amount was exhausted. I am now approximately 70 hours over that initial allotment and will require additional time to finish the work I have begun, as well as assist current counsel through trial.

Since our key witnesses are located in several states, I will need to travel again to help with final trial testimony preparation. I will also need to devote a significant amount of time working with and assisting our experts as they get ready for testimony. Considering what remains to be accomplished, I estimate I will need another 75 hours of time to be ready to go to trial on November 27, 2006.

Thank you for your hard work and assistance in this matter. Please let me know what else you may need from me in order to move forward and be ready trial.

Sincerely,



Paige Munn Tarr

A007883

CONFIDENTIAL ATTORNEY WORK PRODUCT

PSYCHIATRIC CHRONOLOGY OF MIKAL DEEN MAHDI

FROM AUGUST 23, 1992 – OCTOBER 19, 1992

**Place of Admission: State of Maryland DHMH Walter P. Carter Center/Maryland Department of Health
and Mental Hygiene**

DOB Redact

DOCUMENT KEY

SAE= Substance Abuse Education
NSG=Nursing
SW=Social Worker
AT=Activity Therapy
OT=Occupational Therapy
LOA=Leave of Absence
TP=Treatment Plan
TC=Treatment Care
PTSD=Post Traumatic Stress Disorder
A=Assessment
P=Plan
T=Treatment
E=Evaluation
R/O=Rule Out
prn=as needed
im=by mouth

Family Key:

Mikal = Client
Ms. Burwell = LaWanda Burwell, Mikal's aunt
Mr. Burwell = Carson Burwell, Mikal's paternal uncle

**DEFENDANT'S
EXHIBIT**

39-11 11 04-164
LO

Date **Description**

8/23/92 **SW Consultation Note at Hospital (5:30pm):**

Mikal is a 9 year old black male brought to Baltimore County General Hospital's Emergency Room by police on emergency petition for evaluation, following their response to an investigation of alleged physical abuse. Mikal's uncle, who had accompanied him, left prior to this evaluation's arrival. Patient was interviewed and provided information as follows. A call was placed to Mikal's aunt LaWanda Burwell to obtain additional/confirming report.

Mikal said that he had been told to "read and study" today by his aunt. He said that he was "bored" and wanted to be outside playing. He said he went outdoors "without permission", and when he returned "my aunt beat me on my back and legs with a belt." Mikal said he called "911" to "report abuse." When police arrived he told them, "the only solution for me is to kill myself." He then asked for the officer's gun to shoot himself. Police then escorted Mikal to the Emergency Room. Ms. Burwell gave much the same account of today's events and volunteered that she had "beaten" Mikal today "with a belt."

Social History: Mikal is the youngest of two sons of divorced/separated Parents. His 11-year-old brother is currently living in Texas with relatives. Mikal reported that his mom left them when he was four and he lived at first with his father. His father is incarcerated - possibly for assault/abuse of Mikal's mother. Mikal has lived in a series of different relatives' houses. Since 10/91 he has been living with his paternal uncle and aunt Carson and LaWanda Burwell. Mikal said he has done poorly in school and thinks "I must be dumb." He will be entering third grade this fall. Mikal claims he has no close friends and that peers make fun of him. Mikal reports being "hated" by his aunt and uncle. His feeling is based on "always getting beaten for not getting good grades." At present he lives in the home with aunt and uncle and their 5 year old son and 4 year old daughter. He has a half-cousin on his uncle's side, age 15, who shares his room when he comes to stay "summers and holidays." Mikal does not feel loved or "understood" by his cousins. Ms. Burwell said that this July Mikal went to stay with his father and grandmother in Virginia. His mother was supposed to have kept him this month, but his parents fought, possibly physically, and his uncle brought him back to Baltimore two weeks ago.

Medical History: Has had chicken pox, measles, and colds. Denies surgery or hospitalization. Allergic to pollen. Denies current use of prescription drugs and both he and his family deny any history of substance use/abuse. He states he fractured his right arm at age 5 when he fell off his bike and fractured his right leg at age 4 when fell in the home. No previous formal psychiatric treatment. He did receive counseling from a school counselor last year and said, "even though she didn't come up with any solutions, it made me feel better to talk to someone." No legal history.

Mental Status Exam: Mikal is a well-developed, well-nourished child who was occasionally tearful during interview. His verbal skills were apparently advanced for his years and he was a cooperative informant. He described hi life as "not worth living." He said that he has thought of killing himself and wished for death. He said, "Why is it I'm still alive and people who want to live get to die?" Good attention and concentration. Speech - topic entered. Affect appropriate. Oriented to day, date, place and year. He did admit to eeling "picked on" by peers and "hated" by family. History of and current suicidal ideation as described above. No reported history of homicidal thoughts or destructive behavior. Mikal appears sad and it was not until half way through the interview that he began to appear comfortable by making good eye contact and

occasionally initiating conversation. When asked what he feels might help him he repeated "death is the only solution" and "no one understands."

Diagnosis Impression: Axis I: Major Depression, recurrent suicidal ideation 296.33

Axis II: R/O Developmental Reading Disorder 315.00

Axis III: History of right arm and right leg fracture

Axis IV: Acute 5 Physical abuse alleged

Enduring 5 Recurrent alleged physical abuse; separation from parents

Axis V: GAF Past year 60

Current 50

Recommendation/Intervention/Disposition: Due to Mikal's apparently questionable home situation, his severe depression, and his inability to initiate/follow-through on outpatient treatment, inpatient psychiatric treatment is recommended. Ms. Riley LCSW of CPS verified report of abuse and stated that it was recommended to admit Mikal on certification because this would prevent the family from leaving him from treatment prior to the conclusion of their investigation. Mikal was transferred to Walter P. Carter Center by ambulance on certification and his family was informed by telephone.

8/23/92

Mikal Mahdi age 9 admitted to Walter P. Carter Center for Major Depression with suicidal ideation.

Psychiatric nursing assessment noted history of physical abuse, depressed mood, suicidal attempts or thoughts, homicidal attempts or thoughts. Mikal described himself as loving and friendly and stated his reason for admission to be "I was beaten by my aunt and I called 911 and I told police that I would like to kill myself."

8/24/92

Unit Directors Admission Notes:

Mikal is a 9-year-old black male who states "I don't want to live anymore." He comes from a dysfunctional family where extended family is taking care of him. He tests limits and has been difficult to manage by grandmother and aunt. Mother in VA, father incarcerated. Patient has difficulty realizing his role in conflict.

MSE: good eye contact, speech slow, low tone, well articulated. Thought processes are relevant and pertinent. Thought content centered around difficulties at home, feelings of love and abandonment. Denied suicidal and homicidal ideations. No evidence of thought disorder. Cognition grossly intact.

Imp. Axis I: Dysthymia

R/O Major depression

Adjustment Disorder combined with mixed disturbance of emotional control

II Developmental Reading Disorder

III None

IV Severe

V 45

8/24/92

Inpatient Admission Note

Mikal states "Life is not worth living for me- it's boring, dull!"

Mikal is a 9-year-old black male who was brought to Baltimore County General Hospital ER by police on emergency petition for psychiatric evaluation, following their response to an incident of alleged child abuse. Mikal who is currently living with his aunt LaWanda Burwell and her husband. He states that he had been reading for four days straight and was bored. He was warned not to go out to play, but went outside to play anyway. When he came back he was allegedly beaten on his back and legs with a belt. He called 911 to report abuse and when the police arrived to talk to him he told them "The only solution for me is to kill myself" and he asked for the officer's gun to shoot

himself. Police then escorted Mikal to the ER. The aunt said this was true and admitted to beating Mikal with a belt.

Social History:

Mikal is the younger of two sons of divorced/separated parents. His 11-year-old brother is currently living with the paternal grandmother who was also looking after Mikal until she decided that it was too much for her to look after Mikal too. Mikal is then sent to live with his paternal uncle and aunt LaWanda and Carson Burwell who he has been living with for the past 11 months since 10/91. He states that his aunt beats him every couple of months and that his uncle has beaten him twice. One beating was when his report card showed poor grades. He states that "My mother doesn't care for me!" and she abandoned him at the age of 4. She is apparently living by herself somewhere in VA. The father is currently incarcerated probably for assault/abuse of Mikal's mother. Mikal met both parents a few weeks ago. Since his parents' separation, Mikal has been living in a series of relatives' houses. He states that he has no close friends and that peers make fun of him, but a couple of years ago when he was trying to kill himself by jumping off a bridge, a friend saw him and knocked him down to save him. Although he states that his aunt and uncle "hate" him because he is "always getting beaten for not getting good grades", he expressed a desire for his aunt to come pick him up and to go back home to her. Mikal states that he does poorly in school and thinks, "I must be dumb." He will be entering the third grade this fall. He complains that he is forced to study too much and is not allowed to play as much as he would like to. He lives with his aunt and uncle and their 5-year-old son and 4 year old daughter. He also has a 15-year-old cousin on uncle's side who shares his room when he comes to visit for summer and holidays. Mikal does not feel loved or "understood" by his cousins. On this July 6 he went to stay with his father and grandmother in Virginia. His mother was supposed to have kept him this month but parents fought, possibly physically, and Mikal's uncle brought him back to Baltimore two weeks ago.

Medical History: Has had chicken pox, measles, and colds. Denies surgery or hospitalization. Allergic to pollen. Denies current use of prescription drugs and both he and his family deny any history of substance use/abuse. He states he fractured his right arm at age 5 when he fell off his bike and fractured his right leg at age 4 when fell in the home. No previous formal psychiatric treatment. He did receive counseling from a school counselor last year and said, "even though she didn't come up with any solutions, it made me feel better to talk to someone." No legal history. He states that he has trouble sleeping for the past few months and that his appetite is less than it used to be.

Mental Status examination:

Well developed, light complexioned, sad eyes, sad mood, soft speech, eye contact poor (preferred to look away from interviewer)

He was cooperative during interview although complained when his memory/cognition was tested. He stated he was sleepy and had talked to about 15 people today. His affect restricted but appropriate. He is oriented to date and place. Suicidal ideations - "I will jump off bridge, shoot myself, or kill myself with my bow and arrows." No homicidal ideations. No auditory/visual hallucinations. He is attentive although somewhat drowsy. No delusions. His intellect is average and he remembered the current president. His wishes are "I want my family to be together - that's all I ask for." He would like to have a family when he grows older. He has no plans as to what he wants to be when he grows up.

Strengths: articulate, personable, in good physical health, has relatives

8/24/92

Shift note (7:00am – 3:30pm):

Mikal refused AM blood work.

Physical completed.

Adjusting well to unit with some influence from peers.

Encouraged Mikal to ventilate feelings and thoughts leading to his admission.

8/24/92

Preliminary Admission Note:

Mikal is a 9-year-old black male admitted on 8/92 because of suicidal ideation expressed to police who came to his house after he called about child abuse.

Stated he wanted to kill himself for the last 4 years because of family problems.

Stated he wished his natural parents and older brother were reunited with him.

Presently lives with his paternal uncle and aunt with 3 cousins.

O: Patient compliant with interviewer.

Speech low tone, cadence

No visual or auditory hallucinations.

GI – jump off bridge or roof.

Insight/Judgement fair.

A/P Axis I – Major Depression

II – Deferred

III – None

1) Continue diagnostic evaluation.

2) Complete workup for antidepressant medication.

3) Maintain contact with CPS.

4) Obtain further history from aunt and uncle.

NSG Notes for Mikal first day at Center (11:00 – 7:00pm)

A - Potential for violence and self harm as evidenced by depression and patient's statement on admission that "I still feel like killing myself."

P - Mikal will be encouraged to verbalize feelings and thoughts of self-harm. Engage in individual and group therapy and unit activities. Redirect inappropriate behavior.

I – Maintain Mikal on close observation. Give prn meds as ordered. Time out prn.

E – Mikal slept through the night. Maintained on close observation incidence.

Medical history and physical done.

8/25/92

SW Note:

Patient is a 9-year-old black male admitted on 8/23/92 on certificate due to suicidal ideation. Patient is from Baltimore County and lives with paternal uncle and aunt. Baltimore County P.S. is investigating patient's allegation of physical abuse. P.S. worker, Robin Zimmerman was called today and she will not be available until 8/27/92. Patient's aunt visited today. She provided patient's birth certificate, ss card, immunization record and a signed statement by patient's biological father giving aunt and uncle consent for educational and medical care of patient. The aunt, Ms. Burwell was informed that patient is on Certs, involuntary stay, with a hearing to be held on Monday 8/31/92. She asked if patient needs in-patient stay or can he be treated as outpatient. The family lives in catchment area of Northwestern CMHC. Ms. Burwell agreed to contact me tomorrow to find out if she can have appt. with patient's psychiatrist. Ms. Burwell will bring patient a supply of clothes. She stated that patient has not had psychological

testing, but has been receiving extra help in school to address below grade level academic skills. She said that when patient lived with his father he did not attend school very much due to father's depression and not getting patient sent to school. Ms. Burwell had a brief visit with patient on the Unit because she wanted to reassure him of her interest and concern. Ms. Burwell seemed to feel she would support patient's stay at Carter Center if the doctors think it is necessary and in his interest.

In a meeting with Mikal I asked him what he wanted to have happen and he said he wanted his family to get back together. He expressed concern about being able to send his brother a birthday present (birthday on 9/13/92. He says his brother lives in Texas. He says he doesn't have money to buy his brother a gift. When I asked what he would want if his family could not get back together soon he said to "kill himself." When asked if he wanted to go back and live with his aunt and uncle, he said he didn't want to but did not give a reason. Mikal was told his aunt said that he is artistic and likes crafts and he said that's true.

Another admission note states that Mikal stated that he has wanted to kill himself for the last 4 years because of family problems. He also states that he wishes that his natural parents and older brother were reunited with him.

NSG Note 10pm:

A - Interacting well with peers and staff
P - Assess behavior and encourage socialization and ventilate feelings
I - Monitor behavior and activity
E - Client had a very eventful evening.

8/26/92

Shift Note (7:00 - 3:30pm):

Mikal adjusted well to the Unit.
Tested limits, but redirectable.
Very sneaky towards staff and clients.
Makes faces at other clients in the Quiet Room. When staff ask him to stop throwing checkers he will stop but as soon as their back is turned he will begin throwing checkers again.
Appeared to be very distant when his aunt brought his clothes.
Ate well and participated in group therapy with no problems.
Displays a stable behavior.

8/27/92

AT Note (11:15am):

Mikal appears reserved and shy.
Very cooperative and congenial.
Observed no outbursts of aggression during or outside of any activities. This may be due to his becoming oriented to the ward.
His attention and patience seems better than his peers.

8/27/92

Psychiatric Progress Note:

Mikal repeatedly stated he wants to kill himself because he does not like his life. He sees no possibility of improvement in the future and doesn't see any future for himself.
He states that no one cares for him except his aunt who cares a little bit.
He says he would get more care if he was dead because "at least they may put flowers on my grave."
He says he has had a decreased appetite but no change in sleeping.

No suicide attempts or gestures noted. However he asked the interviewer for a gun and a knife.

He knows when someone dies they do not return.

One of his themes was that he needs someone to pay attention to him.

Mikal's aunt met with Ms. Dolhoff/SW yesterday and gave this history.

She said Mikal returned two weeks ago from a one month stay with his biological father, paternal grandmother and brother.

During the stay Mikal saw his father beat up his grandmother and saw his father's subsequent arrest and Mikal knew his father beat up his mother which prevented him from spending any time with her.

It was April 1992 when Mikal realized his mother was not dead since she was not involved with him the three previous years.

At age 6 years old (reported?) his mother left him, his brother and father.

His father became very depressed.

His father had low paying jobs and there were multiple jobs and moves.

Mikal had trouble in school unlike his older brother who did very well.

The aunt says that Mikal told her that "if he wasn't so stupid then his mother would not have left."

She also said that Mikal had previously spoke about killing himself in reaction to not getting his way or doing something wrong.

After returning from his visit with his father Mikal said, "it takes \$200.00 to get someone to kill yourself"

She also says he cries at night because he doesn't have his family with him.

Observation:

Mikal is kicking the wall because he says he wants to go out and kill himself.

Psychomotor agitation, speech and tone and cadence

TP/TC – goal directed

No Hallucinations

Mood- dysphoric

Affect – dysphoric and occasionally tearful

Conversation themes were wanting to kill himself and that no one cares about him and no future for him.

P+A+O times 3

Memory grossly intact.

Unable to state what he likes about himself, what he wants to be when he grows up, and any goals except to be dead.

A/P Mikal is a 9-year-old with history of suicidal ideation consistent with diagnosis of Major Depression

Workup for antidepressant medication is in progress.

Will plan for utification hearing on 8/31 since he is dangerous to himself.

- 1) Continue antidepressant workup.
- 2) Initiate medication by 8/28/92.
- 3) Explain risks and benefits to Mikal and his present guardians.
- 4) Continue exploration of abandonment and worthlessness themes.
- 5) Continue individual, group, and milieu therapies.

8/27/92

Shift note (7:00 – 3:30pm):

Mikal told staff that his life was all talk and he wanted to commit suicide.

Doctor Note (9:30am)(Dr. Allen):

PRN Meds – Haldol 2mg po or im combined with benadryl 25mg po or im every 2 hours to max 3 in 24 hour for severe agitation, destructive and aggressive behavior. May give im if patient is dangerous to himself or others for 7 days.

Shift Note (3:00 – 11:30pm):

Dr. Allen was with Mikal in Quiet Room earlier in shift.
Close observation.
Recommended in community with peers.
No further management problem.
Verbally easily redirectable.
No verbal or suicide attempts addressed.
Bed remains in the hallway for observation.

Doctor Note (3:00pm)(Dr. Jani):

Unit restriction for 24 hours.

Doctor Note (4:00pm)(Dr. Allen):

Please keep patient on close observation for 72 hours.

8/28/92

Shift Note (11:15 – 7:15am):

Close observation.
Mikal slept through the night without problems or complaints.
No harmful gestures made or attempts.
Continue close observation.

Shift Note (7:00 – 3:30pm):

Mikal tested limits.
Still talking about hurting himself.
Talked about this to group of peers in community meeting.
Still not sure if he has anything to live for.

Doctor Note (3:35pm)(Dr. Allen):

Please extend unit restrictions until 8/31/92 at 11:00am.
Please extend close observation until 8/31/92 at 3:00pm.

Shift Note (3:00 – 11:00pm):

Mikal remains on close observation.
Presented no behavior problems.
Interacted very well with other peers on unit.

SW Note:

Mikal is scheduled for Involuntary Hearing on Monday 8/31/92.
Mikal's aunt, LaWanda Burwell plans to attend the hearing.
Her opinion on continued stay for Mikal depends on results of evaluation, in other words, does child need in-patient treatment to address his problems or can it be addressed as outpatient.

Aunt stated she and her husband are prepared to have Mikal return to their home when he is ready for discharge.

SW suggested aunt and uncle participate in therapy to get support and to demonstrate being in this together with Mikal to address issues and solve problems.

No aftercare arranged yet because of vacation of Mr. Blake, C & A coordinator at Northwestern Community Mental Health Center.

Addiction Services Note:

Mikal attended SAE group on 8/25 and 8/27/92.

Topics: Divorce, Abuse, Trust & How they relate to SA and self esteem

Minimal participation, dwells on how unhappy his life is.

Unable to state any positive qualities about himself.

Unable to accept any compliments from peers.

Behavior this week disruptive to the group process as he consistently threatens staff and peers with suicidal statements.

8/29/92

NSG Note (11:00 – 7:00pm):

Mikal slept through the night.

Stated "I didn't sleep well last night I kept waking up. I feel sad because I keep thinking about my family."

Also stated, "I only want to hurt myself when I can't have my way."

Did not attempt any gesture of self-destruction.

Shift Note (3:00 – 11:00pm):

Made no statements about hurting himself.

Interacted very well with other peers.

8/30/92

Shift Note (3:00 – 11:00pm):

Mikal had a pleasant evening.

Played games with peers and watched television.

Remains on close observation.

Compliant to all requests.

No behavior problems.

8/31/92

Pre – Hearing Note (10:00am):

Mikal states he is not suicidal because he can bring his family together.

When told that children may not have that power he stated "Now I want to kill myself...you making me feel sad."

He says, "If one man can stop slavery I can help my raggedy family."

He says he had a dream in which he fell off a building and didn't end up in heaven or hell and just stayed in the dirt.

Also with him being dead his family would not get back together

He said he may get abused because mother is drinking and smoking more and she maybe abused by her mother for 2 months.

O:

Appears dysphoric, but compliant with interviewer

Speech and tone and cadence TP/TC

No psychotic symptoms goal directed

Mood – "fine and later sad"

Affect - dysphoric

Denies suicidal ideation because he feels he has the power to bring his family back together again.

Denies homicidal ideation P+A+Ox3

Cognition grossly intact.

Insight/Judgement – poor

Bases desire to stay alive on ability to have his parents reunited

A:

Mikal is a 9 year old BM with suicidal ideation c/w diagnosis of Major Depression
Today states he does not want to kill himself because he can bring his natural parents together.

Says he changed his mind about wanting to kill himself yesterday.

Participated on Unit; easily verbally redirectable

Still dysphoric and shows suicidal ideation so is still a danger to himself.

REC:

Go to retention hearing this afternoon

If retained continue individual, group and milieu therapy

Awaiting thyroid profile and EKG, which will finish workup for antidepressant treatment and start medication.

Post - Hearing Note (2:40pm):

Mikal retained at hearing today.

He is now an involuntary patient and will be discharged when his psychiatrists determine he is no longer a danger to himself

During the process he got anxious and ran out of the hearing but came back.

Continues to state he wants to die.

Dr. Allen recommendations:

- 1) Await for EKG and thyroid results. Talk to aunt about risks and benefits.
- 2) Continue individual, group and milieu therapies.

NSG Note:

A - Mood and affect is bright.

No thoughts of depression complained of.

Reports feeling "pretty good."

Getting along well with peers.

Getting needs met appropriately.

P – Continue to engage frequently, give emotional support, encourage him to ventilate feelings.

I – As per plan.

E – Had uneventful evening. Sleeping in room tonight.

Walter P. Carter Child and Adolescent Risk and Substance Abuse Assessment:

Admission Diagnosis

Axis IV Severity Scale (the following were applicable: physical abuse, family violence, abandonment, incarceration of parent, parental separation, multiple placements, and two suicide attempts

Personality characteristics and traits:

Low self-esteem, impulsive traits, pessimistic, does not feel in control, poor problem solving skills, stressful life events, dissatisfaction with life

School related issues and problems:

Negative attitude to school, low self-esteem regarding school, low school achievement

Proneness to problem behaviors:

Low religious involvement; risk taking behaviors (impulsive, dangerous, poor judgement, leading to getting into trouble.

Present Psychological history:

Depression, Suicidal ideation or behavior, Antisocial behavior, conduct disorder, learning disorders

Leisure or recreation:

No or limited involvement in active physical pursuits, no participation in organized team sports.

Family use and treatment:

Alcohol abuse: Occasional use by mother, Not sure by father

Family Assessment Device:

- 1) Affective involvement: Family members unable to show appropriate degree of interest on other activities and concerns. Aunt and/or uncle perceived as relatively cold, critical, hostile, unresponsive, underprotective
- 2) Behavior Control: Perceived parental inflexibility.
- 3) Communication: Frequent negative communication and lack of praise. Perceived lack of parental support.
- 4) Problem Solving: Family does not seem able to resolve problems well enough to maintain effective family functioning.
- 5) Roles: Parents do not provide nurturing environment. Tasks and responsibilities are poorly managed by family. Distrust of parental ability to follow-through.
- 6) General Functioning: Parental Separation, Parental Divorce, Frequent geographic moves.

Diagnostic Summary:

Mikal is admitted to Walter P. Carter Center for suicidal ideations. This is the second suicidal gesture and the first one occurred a couple of years ago. During the interview he continues insisting that killing himself is his only option. It was difficult to interview him because of his extreme anger towards his aunt and uncle and his feelings of hopelessness. In spite of his anger he was able to articulate his thoughts quite well and logically.

He denies use, thoughts, or invitations to participate in drug activities. He has a very interesting concept about drugs and shared his feeling that "drugs are a way to control the population." He was unable to elaborate how he arrived at that conclusion.

In response to questions regarding family substance abuse he reported that his parents like "drugs" and made reference to cigarette smoking and beer. His mother smokes

cigarettes and drinks beer occasionally and his father drinks "non-alcoholic" beer and smokes cigarettes. There is a paternal uncle (Roy) that drinks 1 - 2 beers daily.

According to Mikal he has a "terrible life" because his parents are not with him. He hardly sees his brother. He hates going to school and his aunt is "abusive." He was adamant about using the word abusive rather than strict.

There seems to be a lot of emphasis on academics in his current household and he reports "feeling like a failure" and stated "he's not an "A" student." He has no friends and shared his unsuccessful attempts to talk to family members but they are usually too busy to listen therefore, "he feels like he doesn't exist."

Patient's risk factors:

1. abandonment
2. family separation
3. multiple placements within the family
4. symptoms of depression, feelings of hopelessness, decreased appetite and sleeps poorly
5. genetic vulnerability to alcohol and depression as biological father's history remains questionable; episodic depression after separation . Reported use of non-alcoholic beer indicates there may have been a previous history of alcohol abuse.

9/1/92

Educational Note:

Mikal was very cooperative and he is working on 2nd grade level in reading. He does not read as fluently as he should but it will come as he reads orally more.

NSG Note (9:30pm):

Mikal had a quiet day.
Still preoccupied with suicidal ideations.
Stated, "I want to go in my room and kill myself."
When asked how and why he was going to kill himself he couldn't answer.
Voiced this ideation two times.
Interacted well with peers.
No management problems.
Became extremely upset and tearful when peer cursed his mother.
Stated, "What did I do to him for him to curse my mother."
Very concerned about his mother.
Stated he misses her and would like to see her.

9/01/92

History and Psychosocial Evaluation by SW:

Mikal was born Redact in Petersburg, VA. His parents are of the Muslim faith and their marriage was arranged. The mother was about 17 or 18 when she married the father who was in his middle or late 20s. The parents did not use alcohol or drugs. Mikal has one sibling, a brother who is about one year older. The family lived in a rural area with or near the paternal grandmother's home. When Mikal was 4 to 5 years old, the mother abandoned the family. She came back for a brief time and then left again. Mikal did not have any contact with her for about 4 years and he thought she was dead. The father reportedly became severely depressed after the mother left the family. He did not attend to the children. He did not send them to school regularly and they apparently were left to fend for themselves in many ways. In October 1991 it was decided that the older child would be sent to live with the father's sister in Texas and Mikal would be sent to live with the father's brother in Baltimore, Maryland. The father signed a notarized statement

giving his brother and sister-in-law custody of Mikal and authority to take care of his educational and medical needs. Mikal had failed second grade in VA. After coming to live in Baltimore he was enrolled at the Scott's Branch Elementary School. He was found to have pre-first grade reading skills. He was provided with remedial help and a school counselor. His reading skills began to improve. His aunt and uncle value education and encouraged him to improve his schoolwork. Mikal presented some mild behavioral problems in school. In the Spring of 1992 Mikal had contact with his mother. The mother had some contact with the father. The father beat the mother and she went away. Mikal is aware of this event. In the summer of 1992 Mikal attended a camp and then was sent to Virginia to visit with his father and brother. During the visit, the father beat the grandmother and the grandmother called the police. The father was put in jail and later released. Mikal was a witness to his father beating his grandmother. Because of these events, the visit was terminated early and Mikal was brought back to Baltimore. One day, after being back in Baltimore for about 2 weeks, Mikal wanted to watch TV, but could not watch a program that he wanted to because others were using the two TV sets. He was told to practice his writing skills instead and he was told to stay in the house. He disobeyed and went outside. When he returned, his aunt thought that he should be punished for disobeying and so she beat him with a belt on the buttocks/legs. He was left alone in his room after the beating and Mikal dialed 911 and reported the beating. The police came to the home and surprised the aunt who was not aware that Mikal had called 911. When the police talked with Mikal he told the officer that he wanted to kill himself and asked the officer to give him his gun to use. The officer took Mikal to the Baltimore County General Hospital because of his suicidal remarks. Mikal was evaluated and sent to the Carter Center for admission. During the admission evaluation Mikal again stated that he wanted to kill himself. The admission note quotes him as saying, "life is not worth living for me - it's boring, dull!" He also stated that he would jump off a bridge, shoot himself, or kill himself with his bow and arrow.

School Record

Mikal has a history of multiple school placements and absences from school. He failed second grade and is currently reported to be reading below first grade level. Since coming to Maryland from Virginia in October 1991, he has attended the Scott's Branch Elementary School, second grade and was promoted to third grade. He has been receiving Chapter 1 supplemental educational services. He has presented some mild behavioral problems in school.

Legal Record

Mikal's father has been custodial parent and sole support of Mikal since his mother abandoned the family. The father on October 27, 1991 signed a notarized statement giving Carson and LaWanda Burwell (paternal uncle and aunt) custody and the authority to provide educational and medical care for Mikal.

Current Social Living Situation

Mikal lives with his paternal uncle and aunt, a 15-year-old son of the uncle from his first marriage, and a 19-month-old son and a 5-year-old daughter of the aunt and uncle. The aunt is employed full-time and the uncle has his own business and works full-time. They live in Baltimore County.

Psychosocial Diagnostic Evaluation

Mikal is a 9 year old black male of the Muslim faith. He is verbal, engaging, and in good physical health. He likes biking, swimming, crafts, Nintendo, and TV. Psychosocial stressors for this child have been severe to extreme and enduring. They include multiple

moves and school changes, abandonment by mother, father's depression and violence toward the mother and grandmother. Placement in his aunt and uncle's home required his moving from Virginia to Maryland and also resulted in separation from his brother as well as his father and grandmother. Mikal has had multiple caretakers, inconsistent and ineffective parenting, and school failure. When his mother abandoned the family, Mikal did not see her for years and thought she was dead.

Axis IV Severe/Extreme

Axis V 30

Since admission Mikal has appeared depressed, sad and sometimes angry. He continued to express suicidal ideation. He told me he wants his family to get back together and if he can't have that, his second choice is to kill himself. Protective services has interviewed him and reportedly found no grounds for abuse charges. The aunt has had a meeting with me and a meeting with the psychiatrist. Initially there was some question as to whether or not Mikal could return to his aunt's home because the uncle was thinking that Mikal should be sent back to his father in Virginia. The uncle then changed his mind and is reported to be agreeing with the aunt that Mikal should return to their home. There is the possibility that Mikal will be recommended for treatment with anti-depressant medication. He was retained at an Involuntary Status hearing on 8/31/92 which was attended by his aunt. The aunt has expressed great reservations over Mikal being retained in the hospital. She thought it an extreme setting/method of treatment and questioned whether or not he could be treated as an outpatient, stating that she would take him every day for therapy if necessary. The aunt was told that she did not have the legal right to sign a voluntary admission for Mikal and she was told by the financial agent that she is not the legal guardian and not responsible for the bill. Because of this, she is not sure if she has the legal right to give consent for medication for Mikal. She plans to talk to a lawyer about this issue.

The treatment team plan is for Mikal to receive an evaluation for treatment with anti-depressant medication, to receive psychological testing, to have trial LOAs at his aunt and uncle's home, to be referred for outpatient after-care at the Northwestern Community Mental Health Center, to invite the outpatient therapist to meet with the treatment team before Mikal is discharged, and to have family therapy sessions in addition to individual therapy.

Discharge Plans

The tentative discharge plan is for Mikal to return to his aunt and uncle's home. He is expected to be ready for discharge by October 15, 1992.

9/2/92

Individual Treatment Plan

Attending Physician: Dr. Jani

Resident: Dr. Allen

DSM-III-R

Axis I Major Depression 296.20

R/O PTSD and R/O Oppositional Defiant Disorder

Axis II deferred

Axis III none

Axis IV 4-5 severe to extreme

Axis V GAF =30

Problems/Needs

A1 Suicidal ideation and depressive behavior on the Unit perhaps PTSD

B1 None

C1 Regressed social interactions as evidenced by poor peer relationships, poor interpersonal relationships and difficulty forming attachments to parental caregivers related to dysfunctional family.

D1 Academic underachievement as evidenced by repeating second grade and perhaps developmental delay related to serious emotional disturbance and family dysfunction and perhaps developmental delay.

Short Term Goal

Patient will discuss with individual therapist (Dr. Allen) anger towards parents 3x week in an appropriate manner.

Patient will participate in family therapy sessions 1 x week

Patient will attend school daily at WPCC hospital school

Medicine

Haldol 2 mg po q___ prn ___ agitation

Benadryl 25mg po with prn Haldol

Doctor Note (9:45am) (Dr.Allen):

1) Review Haldol 2mg po or 1 mg IM every 3 hours with a max of 3 every 24 hours as needed for severe agitation and violent behavior.

Please give im only if patient presents danger to self or others for a max of 7 days

Benadryl 25mg po or im every 2 hours with a max of 4 in 24 hours as needed EPS or dystonia

Give im only if dystonia is severe and patient unable to swallow for a max of 7 days.

Please give Benadryl 25mg po combined with each prn Haldol dosage for a max of 7 days.

2) Aunt may visit off visiting hours for one hour for 30 days.

9/2/92

Weekly NSG Note:

A – Potential for self-harm.

P – Supervise and observe patient at all times to intervene and prevent self-harm, engage Mikal in unit activities, encourage verbalization of feelings, therapies as appropriate.

I – Close observation stopped 8/31 at 3:45pm. Patient verbalized suicidal thoughts to staff 8/28, 8/27, 8/30, 8/31, 9/1. No apparent attempts.

E – Mikal continues to express great dissatisfaction with his circumstances and has not evidenced any expectation of improvement. He continues to express suicidal plans. He usually is not aggressive in group activities but does not fully engage and participate. He has expressed some use of suicidal and self-denigrating talk as a device to gain adult attention. He continues to exhibit a possible threat to himself.

Team Meeting Note (Initial ITP)(10:45am):

A1 – Suicidal ideation and depression as evidenced by aunt's reports and observation on unit. Related to major depression and possible PTSD.

B1 – None.

C1 – Regressed social interaction as evidenced by poor peer relationships and difficulty forming attachments to parental caregivers related to dysfunctional family.

D1 – Academic achievement as evidenced by repeating 2nd grade and current below grade level achievement related to serious emotional disturbance and perhaps developmental delay.

Mikal's psychiatric evaluation will be dictated today. Medical work-up is in progress. Mikal is being referred for psychological testing. The tentative discharge plan is for the child to return to his aunt and uncle once he is ready for discharge. Prior to that we will try trial LOA's.

AT Assessment:

Mikal is usually interested in participating in groups however at times he shows depression and indifference to activities.

At times he tends to relate aggressively toward peers. He

Will accept some limit setting during acting out behavior.

Has poor self-esteem, depressed, not much sense of hope.

Can be short at times with much physical and emotional wandering.

Still upset over parent separation and misses outings with his father.

Does not understand why parents are separated.

Reported by others to have no close friends.

Enjoys leisure activities and wants to be involved in arts and crafts, swimming, social groups.

Feels he is Muslim even though he is not living with Dad.

Missing info.

Psychiatry Note (Dr. Allen):

Interim Psychiatric evaluation was _____ today.

SECLUSION NOTE NSG (4:15pm):

A - Mikal became disruptive and destructive breaking a piece off the room door. He was asked to come out of his room. He began to holler, curse, and scream at the top of his voice projected toward the staff. He was offered a prn and he refused po. He started running and escalated. He was nonresponsive to verbal intervention. A code was called to assist with prn. He was then wild. He was given 2mg Haldol and Benadryl 25 IM. He was taken to seclusion by three people supporting head, body, and feet because he was out of control.

P - Decrease agitation and control behavior.

I - Assess pockets for objects. Give prn Benadryl 25/Haldol.

E - Monitor every 15 minutes and check for safety and needs.

Doctor Note (4:15pm)(Dr. Jani):

Seclude up to 2 hours for out of control overstimulated and agitated behavior and destructive to property.

NSG Observation Note:

4:20pm Being destructive, yelling and banging on door.

4:35pm Standing at door banging.

4:50pm Jumping and yelling at door.

5:00pm Pulling on door handle.

5:15pm Standing at door and door open

5:45pm Sitting on floor, eating his dinner.

6:00pm Sitting quietly on floor.

6:20pm Seclusion terminated.

TERMINATION OF SECLUSION NSG (6:15pm):

A – Mikal is sitting on the mattress calm and asking to come out. He states that he will go to his room. He was told that he has to sit in quiet room for 15 minutes and then join the group. The door is opened.

P – Allow Mikal to sit 15 minutes, open door 15 minutes and join peers.

E – The lock door seclusion and prn medication was effective.

Educational Note:

Mikal worked very well today.
Very eager to complete given tasks.

9/3/92

Addiction Services Note:

Mikal attended SAE group on 9/1 and 9/3.
Became upset while playing the board game "Playing it Straight" because an instruction card set him back.
Didn't display good sportsmanship and when asked to leave he began banging on the windows with his fist.
Was pleasant and participated in today's group discussion after film.

Psychiatric note Dr. Allen:

Mikal was secluded yesterday because of destruction and out of control behavior.
Received as needed medication.
Stated he received a needle but the medicine did not work.
He was unable to identify what triggered the event.
O: Denied suicidal ideations today but stated that the only thing that would make him feel better was if his family was together.
A/P: Major depression
All lab results are back and within normal limits.
Still waiting for legal determination for legal guardian of Mikal so we can get permission for medication.
Continue present treatment.

NSG Note (3:00 – 11:00pm):

Mikal received phone call this evening.
Was in a pleasant and talkative mood.
Compliant to all activity.
There were episodes of behavior problems this evening.

9/4/92

SW Note:

Mikal's aunt was contacted on 9/3/92.
Plan was made for family therapy sessions.
Aunt will notify us when she can give consent for medication.
Tentative discharge date 10/15/92.

Psychiatry Progress Note D. Allen (3:30pm):

Mikal presented today in case conference.
States he was nervous about conference.

Still expresses doubt that anyone or anything can help him.
Spoke of his father for the first time stating that they would go fishing.
When asked if he liked it or not he would not answer but continued to describe the fish.
Spoke with aunt today who wants _____ on antidepressants and has not heard from legal _____ about the question of legal guardianship.

O: no suicide attempts or verbalization of suicidal ideation.

A/P: Major Depression

1) Mikal to go on leave of absence with aunt from 10am – 8pm.

If his behavior on Sat. and Sun. is excellent he can go on another LOA on Monday.

2) Continue chipping away at his resistance to expressing his emotions.

3) Continue _____ management.

Case Review Note:

Recommendations:

In therapy, bring up anger at therapist, anger at everyone. Must learn to articulate what he needs.

Therapeutic Goals:

Family to develop sense of empathy.

Identify and express anger.

Overcome depressed negative thinking with cognitive behavioral techniques.

Dependency needs. He denies. (ex. Stomach aches a metaphor for dependency needs.)

Reeducate family on typical feelings kids have when families separate.

Ascertain mental health of parents (psychiatric history).

Doctor Note (3:45pm)(Dr. Allen):

Mikal may go on LOA on Monday 9/7/92 from 10am until 8pm only if he gets 70 points or better on his point sheet on Sat. and Sun. 9/5 and 9/6.

Psychology Note (6:00pm):

Psychological testing was given on 9/3/92.

Mikal was extremely oppositional, but did finally respond to limit setting.

Completed two tests within the battery.

Testing will continue next week.

Attended group therapy on 8/26, 8/28, 9/2, and 9/4.

His depression and oppositionality initially interfered with his full participation in the group activity.

Complained and resisted but would finally do it.

Has improved somewhat in group context.

Responds when limits are clear.

Seems to enjoy UNO games and expresses a wide range of affect (excluding positive feelings) in these groups (8/28 and part of 9/4)

9/5/92

Shift Note (7:00 – 3:30pm): :

Mikal went on LOA with aunt.

9/5/92

NSG Note (8:05pm):

Mikal returned from LOA with his aunt in a jovial upbeat mood.

Relationship between the two very positive and warm.

Aunt reported Mikal did very well.
Mikal said he did well and felt good about the time home.
Was told the benefits of displaying appropriate behavior and discussing issues with aunt instead of acting out.
Responded well to this information and to the emotional support and positive feedback.

9/6/92

Shift Note (7:00 – 3:30pm):

Mikal interacted well with peers and staff.
Was low-keyed,
Participated in group activities, no problems followed rules and regulations. Behavior is stable and pleasant.

NSG Note (7:55pm):

Just after shift change, Mikal began (for no apparent reason) to race around the Day Room, hitting peers, turning over chairs, cursing staff.
Staff asked him his problem, redirected behavior, gave emotional support, tried to give him medication.
He refused medication and stated "I'll spit it out – I don't want any medicine." Given 2 mg Haldol + 25mg IM (refusal of PO meds)
Placed in Quiet Room to deescalate.
Able to calm down after ½ hour.
Nurse had one on one with Mikal and explained the benefits of seeking staff to discuss concerns as an alternative to displaying the acting out behavior noted above.
Mikal initially hostile but later able to calm self during second one on one session.
Ate dinner went to bed.
No further acting out behavior seen.

9/8/92

Psychology Note:

Testing continued.
Less oppositional today.
Continue testing on 9/10.

Educational Note:

Mikal seems more adapted to class setting.
Doesn't appear as sad as when he first came.
His classwork and attitude about his work are good.
Good work habits.

9/9/92

Interim Psychiatric Evaluation

History of Present Illness:

Mikal is a 9-year-old black male who was admitted to the Walter P. Carter Center on August 23, 1992, because of suicidal statements made to the police after he called them to report alleged child abuse. Reportedly that day, his aunt had asked him to practice his reading and he stated that he wanted to go outside, so after she told him that he could not go outside, he went out anyway. After he returned, his aunt beat him on his behind and his legs with a belt. His aunt, Ms. Burwell, states that Mikal has been verbalizing suicidal ideations such as "Why do not shoot me, there is no reason to live", since he came home to live with her and his biological paternal uncle in October 1991. Usually these statements were said after he did not get his way or he made a mistake.

Two weeks prior to admission, Mikal had returned from a month long stay with his father and his paternal grandmother in South Hill, Virginia. During that stay, he observed his father beat up his grandmother who subsequently called the police and his father was incarcerated. He also knew that when his biological mother came to visit, his father also beat up his mother at that time. It was after the incident where his father beat up his grandmother that he returned to Baltimore, to stay with his paternal uncle because of the chaos in South Hill, Virginia.

After his return, Ms. Burwell states that Mikal, out of the blue, one day stated "You only have to pay someone \$200.00 to kill yourself." This statement was said without any precipitating events as stated previously.

Mikal reported some trouble sleeping. He also stated that over the past year his appetite has not been good as previously and he states that he thought he had lost a pound or two. He also reports some trouble sleeping at night. Ms. Burwell states that he has had increased sadness since his return from Virginia. She also states that he is scared of failing the third grade and he blames himself for his family's breakup.

Past Psychiatric History:

Mikal has been followed by his school counselor once a week since October 1991. He has no prior psychiatric hospitalizations.

Past Medical History:

Right arm fracture at age 5. Right leg fracture at age 4 secondary to fall in the home. He is not on any medication and reportedly has no drug allergies.

Family Psychiatric History:

Reported depression in his father after Mikal's biological mother left him when Mikal was 4 years old. There is a question of him taking antidepressant medication, but he has refused counseling.

Family History:

Mikal is a 9-year-old black male who is the second child of a Muslim couple whose marriage was arranged in the Islamic Faith. He has an older brother who is 11 years old and is residing with a paternal aunt in Texas. Reportedly, when Mikal's parents were together they lived with the grandmother and then tried to live by themselves but were unable to support themselves since both the father and the mother had low paying menial jobs which necessitated a return to the grandmother's residence. Mikal's mother left the household when Mikal was 4 years old and he had no contact with her until April 1992, thinking that she was dead. His father was unable to care for Mikal and his older brother and the paternal grandmother was also unable to care for him so Mikal was sent to live with his paternal uncle and aunt, Mr. and Mrs. Burwell in Maryland. In the Burwell household he lives with Mr. and Mrs. Burwell, a 15-year-old cousin and a 5 and 1 year old cousin.

Educational History:

Mikal's academic history is somewhat confusing because reportedly the father did not have enough energy to take Mikal and his brother to school. Mikal reportedly also had behavioral problems in the school system in Virginia. Mikal repeated the second grade when he came to Maryland and is now scheduled to start the third grade.

Admission Mental Status Examination:

Mikal is a well developed, light complexion, 9-year-old black male with sad eyes. He looked his stated age and no abnormal movements or mannerisms were noted. He was cooperative with the interview, even though he said that he is kind of tired because he

had already spoken to about 15 different people on the day of admission. He described his mood as sad. His affect was restricted but appropriate. His speech was soft and his eye contact was poor, preferring to look away from the interviewer. He was oriented to date and place. He had no psychotic symptoms noted. He did have suicidal ideation stating, "I will jump off a bridge, shoot myself and kill myself with my bow and arrows." He denied homicidal ideation. His wish was "I want my family to be together and that is all I ask for." The animal he wanted to be was a crayfish because it can live both in water and on land. He stated that the things he likes to do are play with his Nintendo, his chemistry set and with his bicycle. The main theme of his interview was "the only solution to my problems is to get out of this life." His judgement and insight were poor because the only way he could think of either solving or improving his problems is to die.

Physical Status on Examination:

Reveals a well-developed, well-nourished black male. There were no abnormalities seen, no bruises seen.

Laboratory Data:

All labs were within normal limits.

Admission Diagnosis:

Axis I	Major Depression, Recurrent with suicidal ideation	296.33
	R/O Adjustment Disorder	
Axis II	R/O Developmental Reading Disorder	315.00
Axis III	History of right arm and right leg fractures.	

Hospital Course:

On August 31, 1992 a certification hearing was held and the results were that Mikal was retained at the hearing.

Recommendations:

1. Mikal is to be started on tricyclic antidepressants to treat his Major Depression with Suicidal Ideation.
2. He will need continued individual therapy to address his feelings about the dysfunction of his natural family. He will also need individual therapy to help him adjust to living with his aunt and uncle.
3. Family therapy is also recommended with Mr. And Mrs. Burwell to help them get used to Mikal and Mikal get used to them and help them address problems that will come up in this adjustment period.
4. For placement we recommend that after this hospitalization he return to live with Mr. and Mrs. Burwell in their home.

CURRENT DIAGNOSIS:

Axis I	Major Depression, Single Episode	296.22
	R/O Post Traumatic Stress Disorder	309.89
Axis II	Deferred	
Axis III	History of broken right leg and right arm.	

Psychology Note (4:00pm):

Participated appropriately in group session.

When asked to draw what he visualized during a relaxation exercise he drew a picture in which the objects (e.g. a table) was drawn meticulously and with much detail, while the persons were drawn as stick figures.

NSG Note (9:45pm):

Mikal was low keyed at the beginning of the shift.
Went to dinner, ate poor, stated the food was damn cold.
After dinner he ran from the dining room to the first floor trying to get out of the door but the guards had all doors locked.
Brought back to the Unit and stated he just wanted to get out of here.
Stated later that people are not listening to him.
Stated his right ear hurts and that he didn't hear too good.
Put on somatic board for examination on 9/10/92.
Plan is to monitor all ADL's and assess reason for eloping from dining room.

9/10/92

Doctor Note (8am):

Debrox 4 GTTS - Both Ears QTD for 5 days.

ASSESSMENT TO INITIATE SECLUSION (8:15am):

Mikal went to the door and began pulling, kicking, crying and yelling he wants to get out. When he was redirected from the doorway he went into the dayroom and began throwing chairs.
Was yelling and screaming and cursing staff and presented a threat to staff causing the need for staff to use a Backward Take and put him into seclusion.
Put into seclusion at 8:15am.
His pockets were checked and shoes removed.
Monitored every 15 minutes.

NSG Observation note:

8:15am Placed in seclusion
8:30am Yelling and banging on the door.
8:45am Given a seclusion tray for breakfast.
9:00am Sitting on the mat.
9:15am Seclusion terminated and put in Quiet Room for 15 minutes.

Psychologist attending seclusion note:

Mikal said he was feeling upset and he started throwing chairs.
He would not follow verbal redirection requiring LDS for up to 2 hours.
He calmed down in about 55 minutes.

TERMINATION OF SECLUSION Note (9:15am):

Mikal ate breakfast and has been lying on the mat quiet.
Seclusion was terminated at 9:15am.
Mikal has been quiet and agreed to be in the quiet room for 15 minutes and not to throw anymore chairs.
Continue to monitor behavior.

Group Therapy NSG Note (2:30pm):

Compliant with the project however all his remarks were derogatory about himself and how the staff does not care for him.

Psychologist Note (5:30pm):

Psychological testing was continued today.
Final testing session will be Tuesday (9/15/92)

9/11/92

SW Note (3:15pm):

Mikal and his aunt participated in family therapy on 9/9/92.
Next session is 9/14/92 at 11:00am. The uncle is expected to participate.
Continues to appear depressed.
Receiving psychological testing and Individual therapy.
Issue of medication is not yet resolved.
Aunt is following up on an application for M.A. for Mikal and possible DSS support that is available to people raising children who are not their own biological children.

OT Note:

Mikal attended and enjoyed his first cooking class and demonstrated acceptable social interaction and behavior.
Plan: Approved for OT cooking group 4 times a week to be added to his treatment regimen to develop basic survival of social skills.

NSG Note (9:44pm):

Spent quiet evening watching TV and interacting with peers and staff.
Pleasant and cooperative on approach.
No management problem.
Offers no complaints.

Psychiatry note Dr. Allen:

Mikal had a good LOA on 9/5 with his aunt.
Lost his point sheet and was unable to go on LOA with his aunt on Monday. Attempted to elope from hospital because of ear pain and no one listening to him on 9/9/92.
Occurred after his family meeting with his aunt where he expressed he was afraid that his aunt and uncle would make him leave their house.

Today he had an altercation with a peer and later was able to state how the peer may have felt only after looking at how he felt.
Discussed and agreed upon the requirements for obtaining a LOA on Sunday.
Was able to state how he behaves when he is mad which is inappropriate and became frustrated when asked for alternatives.

Plan:

- 1) Continue to help Mikal _____ his feelings and what behaviors he exhibits.
- 2) Allow Mikal to attain reachable goals in LOAs and reinforce his ability to influence the outcome.
- 3) Ms. Burwell gave me Mikal's father's address so a letter will be written.
- 4) Family meeting with Mr. and Mrs. Burwell and Mikal on Mon. 9/14 at 10:00am.

9/12/92

NSG Note:

No problem for management and voiced no feelings of harming himself.

Doctor Note (1:00am)(Dr. Allen):

LOA on 9/13/92 from 10am to 8pm with aunt only if earns a gold level from 9/11's and 9/12's point sheets without any quiet room, seclusions, or elopements.

9/13/92

LOA Note (7:00 – 3:30pm):

Mikal left for LOA with his aunt at 10:15am.
Affect euthymic.

LOA Return Note (3:00 – 11:00pm):

Mikal returned from LOA at 8:07pm with his uncle.
Uncle states LOA point sheet reflects visit uneventful.
Affect bright smiling.

Addendum:

Medication Omission 4pm Debrox _____ not given. Mikal on LOA.

9/14/92

Shift Note (7:00 – 3:30pm):

Mikal affect and mood euthymic.
Had family session with aunt and uncle today.
Mood remains stable.
Continue to encourage ventilation of thoughts and feelings.

Group Therapy NSG Note:

Quiet but cooperative with group activity.
Able to state he was sad and depressed.
Encouraged to verbalize his feelings to staff.

9/15/92

AT Session (1:00 – 2:00pm):

One on one therapy session with Mikal.
Was agitated, aggressive and upset due to "being made fun of" by his peers.
Is a very sensitive child.
Feels that he is the "odd person out" on the ward.
Melancholy and depressed.
Mood goes up and down quickly.

Psychology Note: (4:30pm):

Seemed eager to come and cooperative.
Told psychologist he had a small puncture wound on the palm of his hand.
Said that while he was on LOA he was angered by his aunt's rule that he could not go beyond the driveway (due to her close observation of his suicidal behavior).
So he jumped off his bike "any old way" and a piece of glass got stuck in his hand.
Claims he removed it with tweezers and told his aunt about it later.
Discussed with Mikal his delay in telling anyone in terms of his need to hurt himself.

9/16/92

ITP (Same as before)

Team Meeting Note: Follow up on 9/2/92 ITP:

Mikal is starting to talk about his feelings, however psychological testing revealed

continued suicidal ideation and depressed affect and fatalistic ideation. Denies suicidal thoughts when asked directly.

Dr. Allen continues to discuss possibility of medication with his aunt.

Mikal was able to participate in family meeting and was able to express concern to family.

He has had two successful LOAs.

He is doing well in school. Completes work and is cooperative.

Plan is to obtain consent for medication and to plan LOAs when Mikal reaches established goals.

Continue individual therapy with Dr. Allen.

Psychology Note Group Therapy (2:00pm):

Mikal attended and participated in activity discussion in which the monster metaphor to symbolize angry outbursts was used.

His attention wandered and his comments seemed loose.

Presented as euthymic (almost silly) and somewhat hyperactive.

Psychology Note (2:30pm):

Psychological testing continued.

Complaints of headache whenever items became more difficult in psychological testing.

Finally refused to continue.

Staff discussed he did not feel well and should miss swimming.

9/17/92

Addiction Services Note (4:30pm):

Attended SAE group on 9/15 and 9/17/92.

Mikal is competing for attention from another male peer and often plays when he should be doing his activity.

Responds to redirection and is able to recall what has been previously stated to him.

9/18/92

Psychiatric Progress Note:

Mikal has improved with his behavior this week.

There has been some competition between him and his male peers for attention.

Still finds it difficult to discuss feelings but there has been improvement. Family meeting held on 9/14 with Mr. and Mrs. Burwell.

Was able to tell his aunt and uncle he was afraid of getting too close because they may send him away.

Aunt and uncle told Mikal that he was their child and they expect to have him until he is grown.

No suicidal ideations or gestures noted.

Affect appears brighter with upward range.

Recommendation:

Mikal to go on overnight LOA on 9/19 – 20 with aunt.

Team meeting with uncle and aunt scheduled for Monday to discuss psychological report and further recommendations.

Aunt working to develop Mikal's sense of control.

Psychology Note (Group Therapy):

Mikal focused on group activity and seemed to enjoy himself.

OT Note:

Mikal participated well in cooking class and followed directions.

9/19/92

NSG Note:

Mikal leaves for LOA with aunt at 11:50am with his aunt.

9/20/92

NSG Note:

Mikal still on LOA.

9/21/92

Group Therapy Note:

Mikal cheerful and cracked a joke during group therapy.
Seems to feel better about himself and so the other boys are relating to him as a peer.
States that his LOA went just fine.

Psychiatry Progress Note:

Mikal did well on LOA without any problems.
Meeting was held between staff and Mr. And Mrs. Burwell to update what is observed by each discipline.
Common thread was Mikal's depression.
Medication was brought up with target _____ but the Burwells decided against medication.
Outpatient treatment discussed and recommended 1 - 2 times a week.

9/22/92

Educational Update:

Mikal became upset during school when he was told he was on building restriction.
He said he had been told he was no longer was building restricted.
He was concerned about this and vowed to find reasons for it when he returned to the unit.

Psychological testing was administered 9/8, 9/15, 9/17, and 9/21/92.
Included the WISC-III, the Wechsler Individual Achievement Test (WIAT), the Bender Gertace, the Draw A _____, Kinetic Family Drawing, TAT, and Roschach.
Mikal was intermittently oppositional and resistant to participating fully in the testing.
This was most noticeable on tests that aroused his performance anxiety.

Results summarized as follows:

WISC - III	Verbal IQ 98 (Average)
	Performance IQ 94 (Average)
	Full Scale IQ 95 (Average)

A factor analysis suggested that Mikal's slow processing speed significantly interferes with his performance on certain cognitive tasks.
It is possible that emotional factors slow down his performance and/or denies his scores such that these IQ scores might present an underestimate of his potential. Had significant strength in his abstract thinking abilities.
Demonstrated significant weakness in computational skill
Bender-Gertalt _____ were consistent with that of the average 9 year old, indicating adequate perceptual-motor skills.

Projective testing suggested profound depression, significant losses and preoccupation with death.

Also suggested anxiety, occasional explosiveness, some unconventional, loose and disorganized thinking, possibility of past experiences with trauma, poor mechanisms for coping, with external and internal stress and underlying anger and a potential for impulsively acting out his feelings.

Also suggested Mikal could be at risk for harming himself without appropriate structure, supervision, and treatment.

Diagnostic Impression: Major Depression
R/O Bipolar Disorder

9/23/92

Educational Note:

Mikal behaved appropriately today.
He did his work as he was asked.
He was very cooperative.

Mikal had a good evening; he socialized with peers and played games.

9/24/92

HALL SECLUSION/BODY NET (8:55am):

Mikal was secluded in hall in bed with a body net when he suddenly began yelling, turning over large tables, throwing chairs and hitting one with an attempt to throw at nurse while totally non-responsive to clarification of expectations.

Recommended appropriate expression of feelings about what had led to his outburst.

Escorted to quiet room by three staff members.

While struggling he began kicking into walls, slamming door, vulgarly _____ staff and completely oppositional to verbal attempts to calm and support him. Rejected all attempts from staff to enable him to talk about his feelings.

NSG Note (Restraint Note/Body Net):

Mikal became extremely agitated after community meeting due to thinking that his peers were laughing at him and calling him crazy.

Began yelling and screaming and stated "they keep laughing at me, I'm not crazy."

Staff talked to Mikal and he was calm enough to go to dining room after receiving as needed medication. Haldol 2mg po and Benadryl 25mg po.

Mikal threw away most of his breakfast and upon getting back to the unit he began throwing chairs and turning over tables, yelling and screaming.

Necessary to placed in quiet room after being non-compliant to verbal intervention.

Called staff names and made verbal threats.

Kicking wall and had out of control behavior.

Refused to be compliant.

Placed in full body net restraint per order Dr. Leal.

Very resistant, carried and placed on bed by two staff members.

Placed in body net at 8:55am.

Talked to by doctor after being quiet and non-resistive to the restraint.

Body net removed at 10:05am and allowed to go in day room.

NSG Observation Note:

8:55am Placed in body net.

9:10am Remained in body net, trying to get self out of restraints.

9:25am Continues to talk negative to staff and still trying to release self from restraint.

9:40am Lying quietly in body net in Hall, circulation good in extremities.

9:55am Lying quietly in body net, continues to talk negative to staff.
10:05am Talked to by staff, Removed from body net.

NSG Note:

Mikal was able to gain control and return to school. He was not a problem to management the rest of the day and interacted with peers and staff.

Educational Note:

Mikal came to school at 11:00am.
He became tired put his head down and went to sleep.
Worked hard to complete assignments in the afternoon.

NSG Note (2:05pm):

Mikal talks about self in very negative ways e.g., "You don't like me; you think I'm crazy; I'm on building restriction for no reason."
Doesn't have any valid reasons for his feelings, nor can he state why he thinks staff would put him on building restriction, other than "You just don't like m." He looks sad, thinks everyone thinks he is crazy.

Plan:

Every 2 hours give verbal feedback he is "OK."

Evaluation:

Despite trying to give positive feedback, Mikal continued not to believe staff's efforts. He does not have the ability at this time to accept a healthy point of view about himself. He sulks and keeps a distance from staff and peers. When called he will walk away only to walk away in the midst of the conversation. He has done this with peers, nursing, and teaching staff.

9/25/92

SW Note (12:30pm):

Treatment team had a meeting with aunt and uncle on 9/21/92.
Meeting was held today with aunt.
Aunt and uncle are refusing consent for medication for Mikal.
Uncle walked out angrily out of 9/21 meeting and has decided not to attend any more meetings.
Treatment plan was discussed with the aunt (cognitive therapy, about 3 times a week for about 20 sessions).
Mikal is expected to be ready for discharge on 10/15/92.
Aunt requested and was told she could attend therapy sessions.
After care plan remains the same- Mikal will be followed by Dr. Allen at University of Maryland after he is discharged.
Mikal appears depressed and angry.

9/25/92

Psychiatric Progress Note (2:30pm)/Doctor Note:

Mikal met with Dr. Allen yesterday and today and discussed his behavior the morning requiring the body net.
Says he woke up mad and when another peer taunted him his mood deteriorated ending in body net.
They spoke of how what he thinks leads to how he feels and then his behaviors resulting from these feelings.
Took everything that was said negatively.

Said he was stupid and people did things to him for fun.
Complained no one listens to him (including his father).
Described his life as a fish bowl and everything mixed up.

Recommendations:

- 1) Continue linking thoughts to feelings and behavior.
- 2) Mikal can go on LOA for five hours with aunt and uncle only if no quiet room, no cursing, no temper outbursts and gold level on 9/26 and 9/27.

9/26/92

Weekly nurse note (7:20am):

A: Potential for self-harm, major depression with suicidal ideation.

P: Provide constant observation and therapies to encourage Mikal to express needs and feelings. Provide nurse advocate.

I : Continue to be involved in therapies. No self harm. Mikal says other people "look at him like he's crazy and also feels others see his feelings in his eyes so he doesn't feel he needs to say what is on his mind.

E: Mikal has not harmed self. Mikal verbalizes profound inability to communicate or receive communication on a feeling level and carries an overlying theme of rejection and dislike. Continue to try to build his trust and give him accurate feedback.

9/27/92

Shift Note/LOA Note (7:00 – 3:30pm):

Mikal left on LOA at 11:00am with his aunt to return at 5:00pm. No medication given. Affect brighter.

LOA Return Note (5:10pm):

Returns from LOA at 5:10pm with his aunt and two little cousins.
Mikal went to a birthday party with for a cousin. He returned with a puzzle, flip flops and a crazy glue pen. They were labeled and placed in office.
Aunt said LOA went well.

Shift Note (3:00 – 11:00pm):

Mikal had a good evening at unit. He played games with his peers and watched TV. No problems at this time.

9/28/92

Shift Note (7:00 – 3:30pm):

Mikal attended school.
Behavior appropriate.
Affect flat.
Interaction with peers minimal.
Encouraged to ventilate his thoughts and feelings.

Shift Note (3:00 – 11:00pm):

Mikal became upset after finding a few pieces of his puzzle missing from his room. He talked to aunt on the phone and verbalized his anger and frustration with her and staff. Mikal dealt with this situation appropriately.

Neuro Pediatric Outpatient Speech/Language Screening:

Mikal had a speech/language screening today at the University of Maryland Outpatient Department.

He had difficulty with the following areas: Auditory comprehension (processing linguistic concepts), verbal expression (grammatic closure), pragmatics (poor topic maintenance, attention span and body position/expression) and Hearing (significant difference between left and right ears – left ear required 30db at same frequency for patient to respond (70db is passing). NOTE to myself :This is either 20 or 70.

Recommendations:

It is recommended that Mikal's hearing be retested. If he fails another screening he should be seen by an ENT and an audiologist. Mikal should also receive a complete speech language evaluation at his school by a speech pathologist and receive treatment if necessary.

9/29/92

Shift Note (7:00am)

Mikal stated his peer S.C. bent his thumb back on 9/28/92 in the evening.
Finger is swollen and very warm to touch.
Placed on somatic board.

NSG Note (8:00am):

Mikal is seen by the nurse and has full range of movement and is able to flex his left thumb.
Observed using his thumb with difficulty but no bruising of thumb.
Slightly warm to touch.

9/30/92

Educational Note:

Mikal's behavior was appropriate.
He worked well and got along with his classmates.

Team Progress Note (ITP Update):

Mikal continues to exhibit depressive symptoms including low self-esteem and self-defeating behaviors.
Continues to externalize his behaviors and feelings.
His aunt and uncle have refused antidepressant medications but are cooperative with therapy.
No medical issues.
Problem continues; the team has met with the family two times.
Academic deficit continues but he is making progress.
Discharge plans are continued.
Mikal will need to demonstrate no self-destructive behavior and intensive therapy will be continued.
Discharge plans to home in approximately 3 weeks.

AT Note (3:30 – 4:30pm):

Mikal is calm today during his activity therapy.
He is normally calm unless made fun of by other children.
He is very sensitive to this.
He becomes angry and hostile towards everyone.
He is able to verbalize his anger well.

10/1/92

Shift Note (3:00 – 11:00pm):

Mikal went swimming this evening and was in a pleasant mod.
He interacted with peers very well and there were no problems.

Educational Note:

Mikal did fine at school today until he decided to walk out of classroom at 1:50pm and was escorted back to the unit.

10/2/92

Educational Note:

Mikal was low-keyed this morning.
Mikal could not hold it together this afternoon.
Started complaining about the amount of work that he was expected to do. Walked out of class at 1:20pm and was escorted back to the unit.

SW Note (1:15pm):

Discharge plans remain the same.
Mikal continues to appear depressed and to have negative thoughts including suicide.

Shift Note (2:45pm):

Mikal attended cognitive therapy conducted by Dr. Jani.
Became upset 2 times and had to leave.
Observed throwing chairs.
Gained control and had a talk with staff.
Returned to school without any further problems.

Psychiatry Progress Note (4:00pm):

Mikal was interviewed today cognitively by Dr. Jani.
A lot of self-deprecating, hopeless and worthless themes emerged.
Was able to cry during the session and when he became too angry he would leave the room and then return.
An event that occurred with a peer was discussed and the associated feelings of being sad, angry, and bad.
Generalized that everyone teases him because he is no good.
Rejected the evidence that all children get teased and stated "I would rather jump off the building and die."
He couldn't identify any other alternatives.
When spoken with later after he walked out of school he stated he did all of his school work wrong.
He said he has felt terrible all week, which led him to have a horrible week.
He expressed he wants to see his natural mother and father.
He doesn't trust anyone or even himself.

Recommendations:

No LOA this weekend for destructive behavior.
Cognitive therapy will continue.

10/3/92

Shift Note (3:00 – 11:00pm):

Mikal went off unit with staff to recreation area.
Became angry with peers when he thought that they were not playing fair.

10/05/92

Educational Note:

Mikal was agitated most of the day at school.
When he got to a point during reading time where the word relax appeared he began mumbling about not being able to relax.
He refused to read the selection.
Mikal continued in the same manner after lunch.

Psychiatric Progress Note (Dr. Allen):

Mikal requested to see Dr. Allen today.
They spoke about the here and now problems including negative perceptions about his handwriting and how people treat him like he is terrible.
He said he felt mad about these situations and his thoughts were that he is bad and everything he does is bad.
All evidence pointed to the opposite but he insisted he still looked at himself negatively.
Later he appeared to understand his perceptions may determine the way he feels. They did an exercise where Mikal had to ask Dr. Allen for help.
He stated he felt good after doing this.
He then looked dysphoric, then became very angry.
He repeated he wanted to jump off the window.

Recommendations:

Continue cognitive therapy and help Mikal change his automatic thoughts to help change his feelings.

SECLUSION NOTE (3:00pm):

Mikal became very agitated and aggressive after therapy session.
He turned over chairs and threw a chair at a staff member.
He did not follow verbal instructions and was put in the quiet room first but did not comply so it was necessary to put him in seclusion.
Recommended to seclude for up to two hours for aggressive agitated behavior.

10/06/92

Educational Note:

Mikal's behavior and participation was much improved today.

Shift Note (7:00 – 3:30pm):

Mikal attended school.
Still appears angry with his affect.
But no impulsive behavior.
Continue to encourage Mikal to ventilate his thoughts and feelings.

10/7/92

NSG Note (7:35pm):

Mikal began crying and yelling to himself in the quiet room at 3:45pm after meeting with Dr. Allen.

Displayed this behavior in response to his level being suspended because he had pulled the fire alarm earlier that day.
Was irritable and somewhat agitated.
After staff talked with him he was able to deescalate in the quiet room and was able to verbalize he understood the negative ramifications of pulling the fire alarm inappropriately.
He said he would work on talking about problems instead of "acting up."

10/8/92

NSG Note (AM):

Mikal was defiant and oppositional refusing to follow directions.
Placed in time out.
Rejected time out and went into bedroom and barricaded himself in his bedroom by propping bed on the door.
Placed in hallway until he was able to voice his feelings.
Gained control of his behavior and went to school.
Has a difficult time accepting trust from others.
Very easily swayed from positive to negative behavior.
Afraid of giving trust to anyone and stated that no one cares about him anyway. Needs firm limits set because he is constantly testing limits.

NSG Note (3:00pm):

Mikal became angry after he made assessment of his behavior earlier in the evening and stated that he agreed that his level needed to be suspended however he still became angry. Necessary to give him 25mg Benadryl and 2mg Haldol and place in quiet room at 2:45pm.

Shift Note (3:00 – 11:30pm):

Evaluation of medication at 4:00pm.
Mikal is very vague and wants to be left alone.
He says "I'm tired of ya'll asking these stupid questions."
He is sent to quiet room and able to enter community when acting appropriately.

10/9/92

SW Note (11:00am):

Mikal is on involuntary status.
It was estimated that he would be ready for discharge by 10/15/92.
Discharge may be delayed depending on his response to Individual Cognitive Therapy which is in progress to address depression and suicidal thoughts. Advised aunt on 10/6/92 that discharge date might be delayed beyond 10/15/92.

Psychology Note (5:45pm):

Mikal attended and participated appropriately in group UNO game.
Was openly proud to be the 2nd place winner.
Smiling and giving "5" to his peers.
Very eager to buy things at the soda store with all of his accumulated stars.
Seemed to be focusing on keeping track of his point sheet today.

Shift Note (3:00 – 11:00pm):

Mikal had a good evening.
No problems at this time.

10/10/92 Shift Note (7:00 – 3:30pm):

Mikal went off unit for activity.
Affect and mood bright.
Able to verbalize his angry feelings appropriately.

10/11/92 NSG Note (10:45pm):

Mikal left for LOA with his uncle at 10:45am to return this p.m.

10/12/92 NSG Note (2:00pm):

Mikal ran from hall downstairs after another peer ran from the cafeteria.
Refused when called to come back.
Was found on the first floor and brought back to the unit by security guards. Was laughing, as if what he had just done was no big deal as if he was joking. Was unaware of the seriousness of his behavior.
Began throwing cushions from the furniture and also threatened to suffocate a staff member with the pillow.
Then began throwing more objects of furniture and talking loud and argumentative.
Unable to manage control of his behavior.
Given 2mg Haldol and 25mg Benadryl PO at 1:25pm.
Medication was effective and Mikal was able to gain control of his behavior. He picked up articles of furniture and clothes and was able to talk to staff in an appropriate manner.
He had a level suspended due to his behavior.

10/13/92 Nutrition Note:

Mikal's weight for the month of October is 84 lbs.
This is a 1 lb. weight loss since admission.
His weight is at the 95th percentile and his height is well below the 5th percentile. Mikal continues to have a pork restriction due to religious beliefs.
He is observed to consume 50% to 75% of his meals.

Shift Note (3:00 – 11:00pm):

Mikal went off unit with staff to activity.
No problems.
Attempted to horseplay and act silly in the evening.
Caught cursing by staff 2 times.

10/14/92 Team Meeting Note (ITP Follow-Up) (9:30am):

Mikal's depression seems to have lifted slightly but his aggressive behavior has increased.
Verbalization of suicidal ideation has decreased.
Although he is hitting others his self-destructive actions have decreased.
Attachments have improved.
He has been seeking support from his aunt.
Continues to have trouble expressing his sadness and anger, which is related to modeling by some significant caregiver.
Improved academics and attitude in school.

The plan is to recommend to aunt and uncle that Mikal remain here for another week so that we have an opportunity to help him channel his aggressive behavior more

appropriately (using a cognitive therapy model). The team established the following discharge criteria. Mikal's behavior will not require LDS or suspended star for one week prior to discharge. Dr. Allen will call aunt and uncle today and tell them this suggestion. She will suggest a family meeting for tomorrow. Outpatient follow-up treatment will be provided by Dr. Allen through University of Maryland.

Doctor Note (4:30pm)(Dr. Allen):

Mikal may go on 12 hour LOA with aunt on 10/17 or 10/18, only if no seclusions, no outbursts, no suspended levels at staff discretion.

10/15/92

AT Note (9:30am):

Mikal has been very well behaved and cooperative.
No behavior problems or emotional outbursts the last few days.
Affect is withdrawn and quiet which is usual.

10/16/92

SW Note (2:10pm):

Mikal is receiving end therapy for depression.
He is expected to be ready for discharge by 10/22/92 and may be discharged before that date.

Shift Note (7:00 - 3:30pm):

Mikal displayed a pleasant behavior and interacted well with peers.
Helped peers in community with solving their problems.
Followed rules and regulations.

NSG Note (9:30pm):

Mood and affect brighter, pleasant, friendly. No outbursts.
Continue to encourage Mikal to ventilate feelings and to avoid outbursts as a way of getting needs met.
Played games, watched TV and got needs met appropriately.

10/18/92

LOA Note:

Mikal left on LOA at 10:15am with his uncle.
Affect and mood bright.
Returned at 9:05pm.
Uncle said he did well and had "perfect behavior."

10/19/92

Discharge Psychiatric Note:

Date of Admission - August 23, 1992
Date of Discharge - October 19, 1992

Mikal was admitted for suicidal ideation. He adjusted to unit. He showed suicidal ideation combined with major depression and was treated with therapy since medication was not approved by his aunt or uncle. He responded to cognitive therapy with increased ability to express feelings, improved affect and decreased self-derogatory statements. He did show _____ of leaving and going home. No suicidal/homicidal ideations. After care is outpatient with Dr. Allen 10/26 at 5:00pm and Mikal to go home with the Burwells.

**SC v. Mikal D. Mahdi
Paige Munn Tarr Mitigation Services
Bill for services through August 1, 2006**

5/01/06 3 hours

Interview client at KCI

5/02/06 2 hours

Typed interview memos

5/18/06 18 hours

815 miles

Drove with Marjorie Hammock to Lawrenceville, VA to interview Nancy Burwell, Nathaniel Burwell, Ms. Pearson; drove to Richmond to interview Vera Mahdi, Corliss Ardis and Sophia Gee; returned to Columbia.

6/13/06 8 hours

Prepared for trip; travelled to Philadelphia, rented car and drove to hotel

6/14/06 12 hours

In Philadelphia, interviewed Sareef Mahdi; drove to Baltimore, MD; interviewed Carson and Lawanda Burwell, Kathy Burwell

6/15/06 8 hours

Drove rental car back to South Carolina

7/26/06 5 hours

Along with North Carolina counsel, interviewed client; met with Mark Rabil and Janet Holahan about interviews conducted, status of South Carolina case.

17 hours chronology compilation

**73 hours @ \$100.....\$7300
815 miles @ .375 per mile.....305.63**

**DEFENDANT'S
EXHIBIT**

04-164
3-9-11 12 KB

The Law Firm of Carl B. Grant, P.A.

ATTORNEY AT LAW

Member:
South Carolina Bar
Maryland Bar

Columbia Office:
5509 N. Main Street
P.O. Box 3547
Columbia, SC 29203
(803) 754-7411
(803) 754-4593 (FAX)

960 Doyle Street
P.O. Box 1203
Orangeburg, SC 29116-1203
(803) 536-4011
(803) 536-4163 (FAX)

Areas of Practice:
Personal Injury
Criminal Defense
Workers' Compensation
Medical Malpractice
Family Law
Contracts
Military Law
General Law

Jerrold A. Anderson, Esquire

November 4, 2005

Thomas V. Martin
Martin Psychiatric Services, PC
1728 Main St.
Columbia, SC 29201

DEFENDANT'S
EXHIBIT

3-9-11 13 04-104
LD

Re: State of South Carolina vs. Mikal Deen Mahdi

Dear Dr. Martin:

You have now been approved by the Judge to serve as an expert or investigator in the above referenced case. I have enclosed pertinent documents about the case for your perusal and review.

Please contact me at my Orangeburg office after you have reviewed these documents. Also, let me know if there is anything else that you need to perform your professional obligations in this case. Thank you for your service and commitment and I look forward to meeting with you soon. With kind regards, I am

Sincerely,

Carl B. Grant

Carl B. Grant
Attorney at Law

CBG/cb

Enclosure

cc: Glenn Walters, Esquire

*Broad River
Correctional*

*If you need
him to go with
you, call*



The Law Firm of Carl B. Grant, P.A.

ATTORNEY AT LAW

5509 N. Main Street
P.O. Box 3547
Columbia, South Carolina 29230
(803) 754-7411
(803) 754-4593 (FAX)

Member:
South Carolina Bar
Maryland Bar

Orangeburg Office:
960 Doyle Street
P.O. Box 1203
Orangeburg, SC 29116-1203
(803) 536-4011
(803) 536-4163 (FAX)

Areas of Practice:
Personal Injury
Criminal Defense
Workers' Compensation
Medical Malpractice
Family Law
Contracts
Military Law
General Law

January 17, 2006

Dr. Geoffrey McKee
Forensic Psychiatrist
1720 Main Street
Suite 101
P.O. Box 7471
Columbia, SC 29202

**DEFENDANT'S
EXHIBIT**

39-11 14 07-164
LD

Re: State vs. Mikal Mahdi
Documents

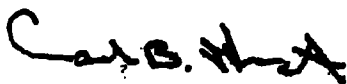
Dear Dr. McKee:

I hereby provide you with the requested documents of the State vs. Mikal Mahdi. These documents are very sensitive, and of course, must not leave your presence and must also be kept strictly confidential. You are being provided these documents for the sole purpose of enabling you to perform your expert services as a Forensic Psychiatrist and as part of the defense team.

Judge Newman has scheduled a hearing for the week of January 30, 2006 at the Sumter County Courthouse in Sumter, South Carolina to determine the status of our preparation for trial so that he may determine a new trial date. At this time there has not been a specific date set for the conference. Please call my paralegal, Ms. Williams, at my Columbia office at 803-754-7411 to schedule a meeting with me during the week of January 23, 2006 so that we may prepare for the week of January 30, 2006 status conference. If you need any additional information from my office to expedite your investigation please let me know as soon as possible.

Thank you for your cooperation. With kind regards, I am

Sincerely,



Carl B. Grant
Attorney at Law

CBG/alw
Enclosure

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
12/13/04	Appointed to case		
12/30/04	Brady Motion, Rule 5; letter of Representation		1.00
12/31/04	Letters and motions		.50
01/17/05	Meeting with client in Bishopville		5.00
02/10/05	Reviewed discovery, case preparation		4.00
04/19/05	Review motion; Case Preparation		1.50
06/27/05	Letter		.50
07/01/05	Motion Hearing – relieving counsel		
	Appointing new co-counsel	2.00	
07/11/05	Memorandum in Support of Psychological Evaluation		3.00
09/30/05	Case Preparation		2.00
10/06/05	Conference call with Judge Newman		1.00
10/11/05	Case Preparation - motions		3.50
	Meeting with client at KCI		1.50
10/12/05	Case Preparation - motions		6.25
10/13/05	Case Preparation – motions; Research		6.25
10/14/05	Case Preparation - motions		2.00
10/15/05	Case Preparation - motions		7.50
10/18/05	Case preparation – motions		5.00
10/20/05	Request for psych evaluation		.50
10/23/05	Preparation of voucher; order and motion		5.00
10/25/05	Case preparation		9.00
10/26/05	Letter to SCDMH		.50
11/01/05	Case preparation – motions		4.50
11/04/05	Preparation of letters		2.50
11/08/05	Letter re: visit		.50
11/09/05	Letter re: visit		.50
11/11/05	Meeting with client at KCI		1.00
11/17/05	Case Preparation		2.50
	Meeting with client		1.25
11/21/05	Telephone conversation with Tarr		.25
Total for this page.....		2.00	78.50

DEFENDANT'S
EXHIBIT

04-164
3-9-11 15 LA

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
11/22/05	Case preparation/Status Conference		4.00
	Meeting with solicitor and co-counsel		1.00
	Telephone conversations with experts		.50
	Conference call with judge, co-counsel, And solicitor		.50
11/26/05	Case preparation		6.00
11/28/05	Status Conference call with judge		1.00
	Case preparation -- witness contacts		2.50
11/29/05	Case Preparation		2.50
11/30/05	Case preparation -- reviewed discovery; Draft of witness information		4.00
12/01/05	Case preparation		.50
12/02/05	Case preparation		3.00
12/05/05	Case preparation -- reviewed discovery; Witness contact list; review fax from NC		1.75
12/07/05	Prepared motion for continuance		2.00
12/08/05	Filing -- motion; travel		1.50
	Psych evaluation for client		2.50
12/09/05	Conference call with Judge Newman		.75
12/13/05	Case preparation		5.75
12/14/05	Case preparation; meeting with D. Girndt		4.50
12/15/05	Case Preparation		4.00
12/16/05	Case preparation -- reviewed discovery		1.75
12/21/05	Prepare order for continuance		2.00
12/22/05	Case preparation -- packet to Tarr		.50
12/27/05	Case Preparation		.50
12/28/05	Case Preparation; telephone call to arrange meeting		.25
12/29/05	Correction to Order for continuance		.50
12/30/05	Meeting with client at KCI		1.00
01/03/06	Review of psych eval.; Letter to client re: psych. eval.		1.50
01/04/06	Package to Emerson Smith		1.00
01/05/06	Meeting with D. Girndt and co-counsel		1.25
01/17/06	Prepared and mailed documents to experts		1.00
Total for this page.....			60.50

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
01/18/06	Meeting with SLED to review their forensic file		2.50
01/20/06	Letter to D. Girndt		.50
01/24/06	Case Preparation		1.00
01/25/06	Meeting with experts and co-counsel; Case preparation		4.50
01/30/06	Case preparation		2.50
01/31/06	Case Preparation		3.00
02/03/06	Preparation of Motion for Change of Venue; filing motion		4.00
	Travel to North Carolina		8.00
	Meeting with N.C. attorneys and Mitigation Specialist (Tarr)		4.00
02/08/06	Preparation letters		.50
★ 02/10/06	Meeting with client and grandmother At KCI		1.00
	Meeting with grandmother; video-depo; case preparation		5.00
02/15/06	Case preparation		5.00
03/08/06	Case Preparation		.50
03/29/06	Meeting with defense team and experts		2.50
	Letter to family		.50
03/30/06	Case Preparation		2.00
04/07/06	Case Preparation		2.50
04/17/06	Letter to defense team; case preparation		3.50
04/27/06	Conference call with judge		.75
04/28/06	Case Preparation		.50
05/03/06	Defense team meeting; case preparation		4.00
05/09/06	Case Preparation		1.50
05/19/06	Draft of motions		4.00
Total for this page.....			63.75

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

Total for In-Court Hours: 2 hours x \$125.00 = \$ 250.00
Total for Out-of-Court Hours: 202.75 hours x \$125.00 = 25,343.75
Total \$25,593.75

Case Expenses:

Ray Swartz and Associates: \$275.00
205.90
FedEx Kinko's 20.83
74.74
Potthast Studios 102.00
Total \$678.47

Total Attorneys fees and expenses \$26,272.22

I hereby certify that the above referenced is an actual compilation of my billable hours and expenses.


Carl B. Grant, Esquire

2-5-07
Date

STATE OF SOUTH CAROLINA) IN THE GENERAL SESSIONS COURT
) THE FIRST JUDICIAL CIRCUIT
COUNTY OF CALHOUN)
2004 DEC -9 A 10:05 CASE 04-GS-09-242, 243, 244

STATE OF SOUTH CAROLINA EDWARD S. GRIFFITH
Plaintiff, CLERK OF COURT
CALHOUN COUNTY
ST. AUGUSTINE, S. C.

-VS-

MIKAL DEEN MAHDI

Defendant

**ORDER OF APPOINTMENT
FOR LEGAL COUNSEL
(Public Defender Conflict)**

The Defendant contends that he is indigent and in need of services of an attorney as contemplated by law. THEREFORE Defendant is appointed Carl B. Grant as lead counsel and Katherine Hudgins as co-counsel, for representation in the above captioned matter pursuant to Rule 608 SCACR.

This 7th day of December, 2004.


Clinton Newman, Judge

Attorney Contact Information

Carl B. Grant
PO Box 1203
Orangeburg, SC 29115
Phone: 803-536-4011
Fax: 803-536-4163

Katherine Hudgins
914 Richland Street, Suite A-102
Columbia, SC 29201
Phone: 803-254-1907
khudgins@kat-law.com

ATTEST: TRUE COPY

EDWARD S. GRIFFITH
CLERK OF COURT
GALHOUN COUNTY

Potthast Studios

Legal Video Productions
 4851 Reamer Avenue
 Columbia, South Carolina 29206
 803-787-0426 FAX 803-787-0248

Invoice

DATE	INVOICE #
2/13/2006	20248

BILL TO

Carl B. Grant
 5509 North Main Street
 Columbia, South Carolina

P.O. NO.	TERMS	PROJECT

QUANTITY	DESCRIPTION	RATE	AMOUNT
3	VHS Video Duplication	30.00	90.00
1	Shipping, Packaging, Handling	12.00	12.00
Billing info: Deposition of: Nancy Burwell State of South Carolina vs Mikal Dean Mahdi 2-10-06 For attorney: Carl B. Grant			

THE LAW FIRM OF CARL B. GRANT, P.A. PH. 803-754-7411 5509 N. MAIN ST COLUMBIA, SC 29203		8003 07-160/532 2006
Pay to the order of <u>Potthast Studios</u>		<u>2/17/06</u> Date
<u>One Hundred two + 00/100</u>		\$ <u>102.00</u> Dollars
BB&T BRANCH BANKING AND TRUST COMPANY 1-800-234-8877 BB&T.com		
For <u>Mahdi</u> Signature	Redacted	<u>Karen W Grant</u> Signature

Total

\$102.00

Ray Swartz & Associates of South Carolina
1064 Gardner Road, Suite 304
Charleston, SC 29407
(843) 556-2923 Fax (843) 556-0825

Carl B. Grant, Esq.
Law Firm of Carl B. Grant
5509 North Main Street
Columbia, SC 29203

INVOICE

INVOICE NO.	DATE	JOB NUMBER
112577	02/27/2006	01-34581
JOB DATE	REPORTER(S)	CASE NUMBER
02/10/2006	KATHYH	
CASE CAPTION		
State of SC vs. Mikol Deen Mahdi		
TERMS		
Due upon receipt		

ORIGINAL AND 3 CERTIFIED COPIES OF TRANSCRIPT OF:

Nancy Burwell

Appearance Fee
Postage

22 Pages

161.70

40.00

4.20

TOTAL DUE >>>>

205.90

THE LAW FIRM OF CARL B. GRANT, PA

01-08

1023

803-794-7411
5509 N. MAIN ST.
P.O. BOX 2947
COLUMBIA, SC 29230

DATE

3/13/06

67-402/549 SE
703

PAY
TO THE
ORDER OF

Ray Swartz & Associates of SC

\$ 205.90

Two Hundred five + 90/100

DOLLARS

Bank of America

ACH RPT 082006483

FOR

Mahdi 112577

Carl B. Grant

Redacted

THE LAW FIRM OF CARL B. GRANT, PA

01-08

1037

803-784-7411
6509 N. MAIN ST.
P.O. BOX 3347
COLUMBIA, SC 29203

DATE

3/24/06

03-442/003 '06
718PAY
TO THE
ORDER OF

Ray Swartz & Associates of SC \$ 275.00
Two hundred seventy five and 00/100 DOLLARS

Bank of America

ACH 03753894492

FOR

01-54631 Nancy Burwell (Mabdi) Karen W Grant

Redacted

Ray Swartz & Associates of South Carolina
1064 Gardner Road, Suite 304
Charleston, SC 29407
(843) 556-2923 Fax (843) 556-0825

Carl B. Grant, Esq.
Law Firm of Carl B. Grant
5509 North Main Street
Columbia, SC 29203

INVOICE

INVOICE NO.	DATE	JOB NUMBER
112416	03/08/2006	01-34631
JOB DATE	REPORTER(S)	CASE NUMBER
02/10/2006	AGENCY	
CASE CAPTION		
State of SC vs. Mikal Deen Mabdi		
TERMS		
Due upon receipt		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Nancy Burwell

Video Service

275.00

TOTAL DUE >>>>

275.00

CARL B GRANT

PAGE 10

FedEx Kinko's

FedEx Kinko's
146 Harbison Blvd
Columbia, SC 29212-2204
(803) 407-4277

3/8/2008 12:09:53 PM EST
Trans.: 7716 Branch: 1538
Register: 003 T111:0191118
Team Member: Laura T.
Customer: Karen Grant

SALE



* 1 5 3 8 0 0 3 7 7 1 6 *

70.50
5 @ 18.8000

FS BW SS Standard 70.50 T
0001 1,175.00 @ 0.0800
Item Discount Amt. 0.0200
Price 0.0800

Total Discount 23.50
Sub-Total 70.50
Deposit 0.00
Tax 4.24
Total 74.74
AmEx (S) 74.74
Account: 2009
Exp: 04/2008
Auth: 569187 (A)
Total Tender 74.74
Change Due 0.00

Karen Grant

Thank you for visiting

FedEx Kinko's
Make It. Print It. Pack It. Ship It.
www.fedexkinkos.com

Customer Copy

***** WELCOME TO *****
COLUMBIA MPO
1601 ASSEMBLY ST
COLUMBIA, SC 29201-2782
03/11/08 11:59AM

Transaction Number 24
USPS # 451804-9550

1. Parcel Post service 4.30
Destination: 29205
Weight: 2 lb. 7.10 oz.
Total Cost: 4.30
Base Rate: 4.30
2. Parcel Post service 3.83
Destination: 29202
Weight: 2 lb. 7.10 oz.
Total Cost: 3.83
Base Rate: 3.83
3. Parcel Post service 4.30
Destination: 29115
Weight: 2 lb. 7.20 oz.
Total Cost: 4.30
Base Rate: 4.30
4. Parcel Post service 4.30
Destination: 29201
Weight: 2 lb. 7.30 oz.
Total Cost: 4.30
Base Rate: 4.30
5. Parcel Post service 4.30
Destination: 29118
Weight: 2 lb. 7.00 oz.
Total Cost: 4.30
Base Rate: 4.30

Subtotal 20.83
Total Charged 20.83

AMEX 20.83

<23-901980128-99>
AMEX <4390311587>
ACCT. NUMBER TRANS # AUTH
XXXX XXXX XXX2 009 551 583708

Thanks.
It's a pleasure to serve you.

ALL SALES FINAL ON STAMPS AND POSTAGE.
REFUNDS FOR GUARANTEED SERVICES ONLY.

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
12/13/04	Appointed to case		
12/30/04	Brady Motion, Rule 5; letter of Representation		1.00
12/31/04	Letters and motions		.50
01/17/05	Meeting with client in Bishopville		5.00
02/10/05	Reviewed discovery, case preparation		4.00
04/19/05	Review motion; Case Preparation		1.50
06/27/05	Letter		.50
07/01/05	Motion Hearing – relieving counsel Appointing new co-counsel	2.00	
07/11/05	Memorandum in Support of Psychological Evaluation		3.00
09/30/05	Case Preparation		2.00
10/06/05	Conference call with Judge Newman		1.00
10/11/05	Case Preparation - motions		3.50
	Meeting with client at KCI		1.50
10/12/05	Case Preparation - motions		6.25
10/13/05	Case Preparation – motions; Research		6.25
10/14/05	Case Preparation - motions		2.00
10/15/05	Case Preparation - motions		7.50
10/18/05	Case preparation – motions		5.00
10/20/05	Request for psych evaluation		.50
10/23/05	Preparation of voucher; order and motion		5.00
10/25/05	Case preparation		9.00
10/26/05	Letter to SCDMH		.50
11/01/05	Case preparation – motions		4.50
11/04/05	Preparation of letters		2.50
11/08/05	Letter re: visit		.50
11/09/05	Letter re: visit		.50
11/11/05	Meeting with client at KCI		1.00
11/17/05	Case Preparation		2.50
	Meeting with client		1.25
11/21/05	Telephone conversation with Tarr		.25
Total for this page.....		2.00	78.50

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
11/22/05	Case preparation/Status Conference		4.00
	Meeting with solicitor and co-counsel		1.00
	Telephone conversations with experts		.50
	Conference call with judge, co-counsel, And solicitor		.50
11/26/05	Case preparation		6.00
11/28/05	Status Conference call with judge		1.00
	Case preparation – witness contacts		2.50
11/29/05	Case Preparation		2.50
11/30/05	Case preparation – reviewed discovery; Draft of witness information		4.00
12/01/05	Case preparation		.50
12/02/05	Case preparation		3.00
12/05/05	Case preparation – reviewed discovery; Witness contact list; review fax from NC		1.75
12/07/05	Prepared motion for continuance		2.00
12/08/05	Filing – motion; travel		1.50
	Psych evaluation for client		2.50
12/09/05	Conference call with Judge Newman		.75
12/13/05	Case preparation		5.75
12/14/05	Case preparation; meeting with D. Girndt		4.50
12/15/05	Case Preparation		4.00
12/16/05	Case preparation – reviewed discovery		1.75
12/21/05	Prepare order for continuance		2.00
12/22/05	Case preparation – packet to Tarr		.50
12/27/05	Case Preparation		.50
12/28/05	Case Preparation; telephone call to arrange meeting		.25
12/29/05	Correction to Order for continuance		.50
12/30/05	Meeting with client at KCI		1.00
01/03/06	Review of psych eval.; Letter to client re: psych. eval.		1.50
01/04/06	Package to Emerson Smith		1.00
01/05/06	Meeting with D. Girndt and co-counsel		1.25
01/17/06	Prepared and mailed documents to experts		1.00
Total for this page.....			60.50

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
01/18/06	Meeting with SLED to review their forensic file		2.50
01/20/06	Letter to D. Girndt		.50
01/24/06	Case Preparation		1.00
01/25/06	Meeting with experts and co-counsel; Case preparation		4.50
01/30/06	Case preparation		2.50
01/31/06	Case Preparation		3.00
02/03/06	Preparation of Motion for Change of Venue; filing motion		4.00
	Travel to North Carolina		8.00
	Meeting with N.C. attorneys and Mitigation Specialist (Tarr)		4.00
02/08/06	Preparation letters		.50
★ 02/10/06	Meeting with client and grandmother At KCI		1.00
	Meeting with grandmother; video-depo; case preparation		5.00
02/15/06	Case preparation		5.00
03/08/06	Case Preparation		.50
03/29/06	Meeting with defense team and experts		2.50
	Letter to family		.50
03/30/06	Case Preparation		2.00
04/07/06	Case Preparation		2.50
04/17/06	Letter to defense team; case preparation		3.50
04/27/06	Conference call with judge		.75
04/28/06	Case Preparation		.50
05/03/06	Defense team meeting; case preparation		4.00
05/09/06	Case Preparation		1.50
05/19/06	Draft of motions		4.00
Total for this page.....			63.75

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

Total for In-Court Hours:	2 hours x \$125.00 =	\$ 250.00
Total for Out-of-Court Hours:	202.75 hours x \$125.00 =	<u>25,343.75</u>
Total		\$25,593.75

Case Expenses:

Ray Swartz and Associates:	\$275.00
	205.90
FedEx Kinko's	20.83
	74.74
Potthast Studios	<u>102.00</u>
Total	\$678.47

Total Attorneys fees and expenses	\$26,272.22
-----------------------------------	-------------

I hereby certify that the above referenced is an actual compilation of my billable hours and expenses.


Carl B. Grant, Esquire

2-5-07
Date

STATE OF SOUTH CAROLINA) IN THE GENERAL SESSIONS COURT
) THE FIRST JUDICIAL CIRCUIT
COUNTY OF CALHOUN)
2004 DEC -9 A 10:05 CASE 04-GS-09-242, 243, 244

STATE OF SOUTH CAROLINA EDWARD S. GRIFFITH
Plaintiff, CLERK OF COURT
CALHOUN COUNTY
ST. MICHAEL'S, SC

Plaintiff,

-VS-

MIKAL DEEN MAHDI

Defendant

**ORDER OF APPOINTMENT
FOR LEGAL COUNSEL
(Public Defender Conflict)**

The Defendant contends that he is indigent and in need of services of an attorney as contemplated by law. THEREFORE Defendant is appointed Carl B. Grant as lead counsel and Katherine Hudgins as co-counsel, for representation in the above captioned matter pursuant to Rule 608 SCACR.

This 7th day of December, 2004.


Clifford Newman, Judge

Attorney Contact Information

Carl B. Grant
PO Box 1203
Orangeburg, SC 29116
Phone: 803-536-4011
Fax: 803-536-4163

Katherine Hudgins
914 Richland Street, Suite A-102
Columbia, SC 29201
Phone: 803-254-1907
khudgins@kat-law.com

ATTEST: TRUE COPY

EDWARD B. GRIFFITH
CLERK OF COURT
CALHOUN COUNTY

Potthast Studios

Legal Video Productions
4851 Reamer Avenue
Columbia, South Carolina 29206
803-787-0426 FAX 803-787-0248

Invoice

DATE	INVOICE #
2/13/2006	20248

BILL TO

Carl B. Grant
5509 North Main Street
Columbia, South Carolina

P.O. NO.	TERMS	PROJECT

QUANTITY	DESCRIPTION	RATE	AMOUNT
3	VHS Video Duplication	30.00	90.00
1	Shipping, Packaging, Handling	12.00	12.00
Billing Info: Deposition of: Nancy Burwell State of South Carolina vs Mikal Dean Mahdi 2-10-06 For attorney: Carl B. Grant			

THE LAW FIRM OF CARL B. GRANT, P.A.
PH. 803-784-7411
5509 N. MAIN ST
COLUMBIA, SC 29203

8003
07-160532
15001

2/17/06

Pay to the order of Potthast Studios \$ 102.00

One Hundred two + w/100

BB&T
BRUNER BANKING AND TRUST COMPANY
1-800-848-0121 bb&t.com

For Mahdi Redacted Karen W Grant

Total

\$102.00

Ray Swartz & Associates of South Carolina
 1064 Gardner Road, Suite 304
 Charleston, SC 29407
 (843) 556-2923 Fax (843) 556-0825

INVOICE

INVOICE NO.	DATE	JOB NUMBER
112577	02/27/2006	01-54581
JOB DATE	REPORTER(S)	CASE NUMBER
02/10/2006	KATHYH	
CASE CAPTION		
State of SC vs. Mikal Deen Mahdi		
TERMS		
Due upon receipt		

Carl B. Grant, Esq.
 Law Firm of Carl B. Grant
 5509 North Main Street
 Columbia, SC 29203

ORIGINAL AND 3 CERTIFIED COPIES OF TRANSCRIPT OF:

Nancy Burwell
 Appearance Fee
 Postage

22 Pages

161.70

40.00

4.20

TOTAL DUE >>>>

205.90

THE LAW FIRM OF CARL B. GRANT, PA

01-08

1023

803-794-7411
 5509 N. MAIN ST.
 P.O. BOX 2947
 COLUMBIA, SC 29206

DATE 3/13/06

02-08/083 ST
TOL

PAY
 TO THE
 ORDER OF

Ray Swartz & Associates of SC \$ 205.90

Two Hundred five + 90/100

DOLLARS

Bank of America

ACH RT @ 02/20/06

FOR Mahdi 112577

Handwritten signature: *Carl B. Grant*

Redacted

THE LAW FIRM OF CARL B. GRANT, PA

01-88

1037

803-764-7411
6509 N. MAIN ST.
P.O. BOX 3947
COLUMBIA, SC 29230

DATE

3/24/06

07-148723 SC
708

PAY

TO THE

ORDER OF

Ray Swartz & Associates of SC

\$ 275.00

Two hundred seventy five and 00/100

DOLLARS & 00/100

Bank of America

ACH 027 05389432

FOR

01-54631

Nancy Burwell (Hobbs)

Karen W Grant

Redacted

Ray Swartz & Associates of South Carolina
1064 Gardner Road, Suite 304
Charleston, SC 29407
(843) 556-2923 Fax (843) 556-0825

Carl B. Grant, Esq.
Law Firm of Carl B. Grant
5509 North Main Street
Columbia, SC 29203

INVOICE

INVOICE NO.	DATE	JOB NUMBER
112416	03/08/2006	01-54631
JOB DATE	REPORTER(S)	CASE NUMBER
02/10/2006	AGENCY	
CASE CAPTION		
State of SC vs. Mikal Dean Mahdi		
TERMS		
Due upon receipt		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Nancy Burwell

Video Service

275.00

TOTAL DUE >>>>

275.00

FedEx Kinko's

FedEx Kinko's
148 Harbison Blvd
Columbia, SC 29212-2204
(803) 407-4277

3/8/2008 12:09:50 PM EST
Trans.: 7716 Branch: 1538
Register: 003 T111:0191118
Team Member: Laura T.
Customer: Karen Grant

SALE



* 1 5 3 8 0 0 3 7 7 1 8 *

70.50
5 @ 18.8000

FS BW SS Standard 70.50 T
0001 1,175.00 @ 0.0800
Item Discount Amt. 0.0200
Price 0.0600

Total Discount 23.50
Sub-Total 70.50
Deposit 0.00
Tax 4.24
Total 74.74
AmEx (S) 74.74
Account: 2009
Exp: 04/2008
Auth: 569187 (A)
Total Tender 74.74
Change Due 0.00

Karen Grant

Thank you for visiting

FedEx Kinko's
Make It. Print It. Pack It. Ship It.
www.fedexkinkos.com

Customer Copy

***** WELCOME TO *****
COLUMBIA MPO
1601 ASSEMBLY ST
COLUMBIA, SC 29201-2782
03/11/08 11:59AM

Transaction Number 24
USPS # 451804-0550

1. Parcel Post service 4.30
Destination: 29205
Weight: 2 lb. 7.10 oz.
Total Cost: 4.30
Base Rate: 4.30
2. Parcel Post service 3.83
Destination: 29202
Weight: 2 lb. 7.10 oz.
Total Cost: 3.63
Base Rate: 3.83
3. Parcel Post service 4.30
Destination: 29115
Weight: 2 lb. 7.20 oz.
Total Cost: 4.30
Base Rate: 4.30
4. Parcel Post service 4.30
Destination: 29201
Weight: 2 lb. 7.30 oz.
Total Cost: 4.30
Base Rate: 4.30
5. Parcel Post service 4.30
Destination: 29116
Weight: 2 lb. 7.00 oz.
Total Cost: 4.30
Base Rate: 4.30

Subtotal 20.83
Total Charged 20.83

ANEX 20.83

<23-801980128-99>
ANEX <4390311587>
ACCT. NUMBER TRANS # AUTH
XXXX XXXX XXX2 009 551 563708

Thanks.
It's a pleasure to serve you.
ALL SALES FINAL ON STAMPS AND POSTAGE.
REFUNDS FOR GUARANTEED SERVICES ONLY.

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
12/13/04	Appointed to case		
12/30/04	Brady Motion, Rule 5; letter of Representation		1.00
12/31/04	Letters and motions		.50
01/17/05	Meeting with client in Bishopville		5.00
02/10/05	Reviewed discovery, case preparation		4.00
04/19/05	Review motion; Case Preparation		1.50
06/27/05	Letter		.50
07/01/05	Motion Hearing – relieving counsel Appointing new co-counsel	2.00	
07/11/05	Memorandum in Support of Psychological Evaluation		3.00
09/30/05	Case Preparation		2.00
10/06/05	Conference call with Judge Newman		1.00
10/11/05	Case Preparation - motions		3.50
	Meeting with client at KCI		1.50
10/12/05	Case Preparation - motions		6.25
10/13/05	Case Preparation – motions; Research		6.25
10/14/05	Case Preparation - motions		2.00
10/15/05	Case Preparation - motions		7.50
10/18/05	Case preparation – motions		5.00
10/20/05	Request for psych evaluation		.50
10/23/05	Preparation of voucher; order and motion		5.00
10/25/05	Case preparation		9.00
10/26/05	Letter to SCDMH		.50
11/01/05	Case preparation – motions		4.50
11/04/05	Preparation of letters		2.50
11/08/05	Letter re: visit		.50
11/09/05	Letter re: visit		.50
11/11/05	Meeting with client at KCI		1.00
11/17/05	Case Preparation		2.50
	Meeting with client		1.25
11/21/05	Telephone conversation with Tarr		.25
Total for this page.....		2.00	78.50

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
11/22/05	Case preparation/Status Conference		4.00
	Meeting with solicitor and co-counsel		1.00
	Telephone conversations with experts		.50
	Conference call with judge, co-counsel, And solicitor		.50
11/26/05	Case preparation		6.00
11/28/05	Status Conference call with judge		1.00
	Case preparation -- witness contacts		2.50
11/29/05	Case Preparation		2.50
11/30/05	Case preparation -- reviewed discovery; Draft of witness information		4.00
12/01/05	Case preparation		.50
12/02/05	Case preparation		3.00
12/05/05	Case preparation -- reviewed discovery; Witness contact list; review fax from NC		1.75
12/07/05	Prepared motion for continuance		2.00
12/08/05	Filing -- motion; travel		1.50
	Psych evaluation for client		2.50
12/09/05	Conference call with Judge Newman		.75
12/13/05	Case preparation		5.75
12/14/05	Case preparation; meeting with D. Girndt		4.50
12/15/05	Case Preparation		4.00
12/16/05	Case preparation -- reviewed discovery		1.75
12/21/05	Prepare order for continuance		2.00
12/22/05	Case preparation -- packet to Tarr		.50
12/27/05	Case Preparation		.50
12/28/05	Case Preparation; telephone call to arrange meeting		.25
12/29/05	Correction to Order for continuance		.50
12/30/05	Meeting with client at KCI		1.00
01/03/06	Review of psych eval.; Letter to client re: psych. eval.		1.50
01/04/06	Package to Emerson Smith		1.00
01/05/06	Meeting with D. Girndt and co-counsel		1.25
01/17/06	Prepared and mailed documents to experts		1.00
Total for this page.....			60.50

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

<u>DATE</u>	<u>SERVICES RENDERED</u>	<u>IN-COURT HOURS</u>	<u>OUT-OF-COURT HOURS</u>
01/18/06	Meeting with SLED to review their forensic file		2.50
01/20/06	Letter to D. Girndt		.50
01/24/06	Case Preparation		1.00
01/25/06	Meeting with experts and co-counsel; Case preparation		4.50
01/30/06	Case preparation		2.50
01/31/06	Case Preparation		3.00
02/03/06	Preparation of Motion for Change of Venue; filing motion -		4.00
	Travel to North Carolina		8.00
	Meeting with N.C. attorneys and Mitigation Specialist (Tarr)		4.00
02/08/06	Preparation letters		.50
★ 02/10/06	Meeting with client and grandmother At KCI		1.00
	Meeting with grandmother; video-depo; case preparation		5.00
02/15/06	Case preparation		5.00
03/08/06	Case Preparation		.50
03/29/06	Meeting with defense team and experts Letter to family		2.50
			.50
03/30/06	Case Preparation		2.00
04/07/06	Case Preparation		2.50
04/17/06	Letter to defense team; case preparation		3.50
04/27/06	Conference call with judge		.75
04/28/06	Case Preparation		.50
05/03/06	Defense team meeting; case preparation		4.00
05/09/06	Case Preparation		1.50
05/19/06	Draft of motions		4.00
Total for this page.....			63.75

THE STATE OF SOUTH CAROLINA VS. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-0242, 0243, 0244
TIME SHEET FOR CARL B. GRANT, ESQUIRE

Total for In-Court Hours:	2 hours x \$125.00 =	\$ 250.00
Total for Out-of-Court Hours:	202.75 hours x \$125.00 =	<u>25,343.75</u>
Total		\$25,593.75
Case Expenses:		
Ray Swartz and Associates:		\$275.00
		205.90
FedEx Kinko's		20.83
		74.74
Potthast Studios		<u>102.00</u>
Total		\$678.47
Total Attorneys fees and expenses		\$26,272.22

I hereby certify that the above referenced is an actual compilation of my billable hours and expenses.

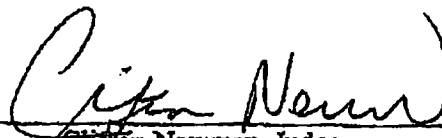

Carl B. Grant, Esquire

2-5-07
Date

STATE OF SOUTH CAROLINA	)	IN THE GENERAL SESSIONS COURT
	)	THE FIRST JUDICIAL CIRCUIT
COUNTY OF CALHOUN	)	CASE 04-GS-09-242, 243, 244
	)	
STATE OF SOUTH CAROLINA	)	
	)	EDWARD S. GRIFFITH
	)	CLERK OF COURT
Plaintiff,	)	CALHOUN COUNTY
	)	ST. GEORGE, S.C.
-vs-	)	ORDER OF APPOINTMENT
	)	FOR LEGAL COUNSEL
MIKAL DEEN MAHDI	)	(Public Defender Conflict)
	)	
Defendant	)	

The Defendant contends that he is indigent and in need of services of an attorney as contemplated by law. THEREFORE Defendant is appointed Carl B. Grant as lead counsel and Katherine Hudgins as co-counsel, for representation in the above captioned matter pursuant to Rule 608 SCACR.

This 7th day of December, 2004.


Clifton Newman, Judge

Attorney Contact Information

Carl B. Grant
PO Box 1203
Orangeburg, SC 29115
Phone: 803-536-4011
Fax: 803-536-4163

Katherine Hudgins
914 Richland Street, Suite A-102
Columbia, SC 29201
Phone: 803-254-1907
khudgins@kat-law.com

ATTEST: TRUE COPY


EDWARD S. GRIFFITH
CLERK OF COURT
CALHOUN COUNTY

Potthast Studios

Legal Video Productions
4851 Reamer Avenue
Columbia, South Carolina 29206
803-787-0426 FAX 803-787-0248

Invoice

DATE	INVOICE #
2/13/2006	20248

BILL TO

Carl B. Grant
3309 North Main Street
Columbia, South Carolina

P.O. NO.	TERMS	PROJECT

QUANTITY	DESCRIPTION	RATE	AMOUNT
3	VHS Video Duplication	30.00	90.00
1	Shipping, Packaging, Handling	12.00	12.00
Billing Info: Deposition of: Nancy Burwell State of South Carolina vs Mikal Deen Mahdi 2-10-06 For attorney: Carl B. Grant			

THE LAW FIRM OF CARL B. GRANT, P.A. PH. 803-784-7411 5509 N. MAIN ST COLUMBIA, SC 29203		8003 87-150/532 19901
2/17/06		Bill
Pay to the Order of <u>Potthast Studios</u>		\$ 102.00
<u>One hundred two + w/100</u>		Dollars
BB&T BRANNON BANKING AND TRUST COMPANY 1-800-848-8187 BB&T.com		
For <u>Mahdi</u>	<u>Karen W Grant</u>	Redacted

Total

\$102.00

Ray Swartz & Associates of South Carolina
1064 Gardner Road, Suite 304
Charleston, SC 29407
(843) 556-2923 Fax (843) 556-0825

INVOICE

INVOICE NO.	DATE	JOB NUMBER
112577	02/27/2006	01-54581
JOB DATE	REPORTER(S)	CASE NUMBER
02/10/2006	KATHYH	
CASE CAPTION		
State of SC vs. Mikal Dean Mahdi		
TERMS		
Due upon receipt		

Carl B. Grant, Esq.
Law Firm of Carl B. Grant
5509 North Main Street
Columbia, SC 29203

ORIGINAL AND 3 CERTIFIED COPIES OF TRANSCRIPT OF:

Nancy Burvell

Appearance Fee
Postage

22 Pages

161.70

40.00

4.20

TOTAL DUE >>>>

205.90

THE LAW FIRM OF CARL B. GRANT, PA

01-08

1023

803-754-7411
5508 N. MAIN ST.
P.O. BOX 2947
COLUMBIA, SC 29230

DATE 3/13/06

81-402/533 52
718

PAY
TO THE
ORDER OF

Ray Swartz & Associates of SC \$ 205.90

Two Hundred five + 90/100

DOLLARS @

Bank of America

ACH RPT 02200483

FOR Mahdi 112577

Karen W. Grant

Redacted

THE LAW FIRM OF CARL B. GRANT, PA

01-88

1037

803-754-7411
5509 N. MAIN ST.
P.O. BOX 3947
COLUMBIA, SC 29203

DATE

3/24/06

03-4487231 SC
708PAY
TO THE
ORDER OF

Ray Swartz & Associates of SC \$ 275.00
Two hundred seventy five and 00/100 DOLLARS

Bank of America

ACH PAY 03/28/06

FOR

01-54631

Nancy Burwell (Mehdi)

Karen W Grant

P

Redacted

P

Ray Swartz & Associates of South Carolina
1064 Gardner Road, Suite 304
Charleston, SC 29407
(843) 556-2923 Fax (843) 556-0825

Carl B. Grant, Esq.
Law Firm of Carl B. Grant
5509 North Main Street
Columbia, SC 29203

INVOICE

INVOICE NO.	DATE	JOB NUMBER
112416	03/08/2006	01-34631
JOB DATE	REPORTER(S)	CASE NUMBER
02/10/2006	AGENCY	
CASE CAPTION		
State of SC vs. Mikal Deen Mahdi		
TERMS		
Due upon receipt		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Nancy Burwell
Video Service

275.00

TOTAL DUE >>>>

275.00

01/25/2007 13:18 8037544593

CARL B GRANT

PAGE 10

FedEx Kinko's

FedEx Kinko's
148 Harbison Blvd
Columbia, SC 29212-2204
(803) 407-4277

3/8/2008 12:09:53 PM EST
Trans.: 7716 Branch: 1538
Register: 003 T111:0191118
Team Member: Laura T.
Customer: Karen Grant

SALE



* 1 5 3 8 0 0 3 7 7 1 8 *

70.50

5 @ 18.8000

FS BW SS Standard 70.50 T
0001 1,175.00 @ 0.0800
Item Discount Amt. 0.0200
Price 0.0800

Total Discount 23.50
Sub-Total 70.50
Deposit 0.00
Tax 4.24
Total 74.74
AmEx (S) 74.74
Account: 2009
Exp: 04/2008
Auth: 569187 (A)
Total Tender 74.74
Change Due 0.00

Thank you for visiting

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www.fedexkinkos.com

Customer Copy

***** WELCOME TO *****
COLUMBIA MPO
1601 ASSEMBLY ST
COLUMBIA, SC 29201-2782
03/11/08 11:59AM

Transaction Number 24
USPS # 451804-8550

1. Parcel Post service 4.30
Destination: 29205
Weight: 2 lb. 7.10 oz.
Total Cost: 4.30
Base Rate: 4.30
2. Parcel Post service 3.83
Destination: 29202
Weight: 2 lb. 7.10 oz.
Total Cost: 3.83
Base Rate: 3.83
3. Parcel Post service 4.30
Destination: 29145
Weight: 2 lb. 7.20 oz.
Total Cost: 4.30
Base Rate: 4.30
4. Parcel Post service 4.30
Destination: 29201
Weight: 2 lb. 7.30 oz.
Total Cost: 4.30
Base Rate: 4.30
5. Parcel Post service 4.30
Destination: 29116
Weight: 2 lb. 7.00 oz.
Total Cost: 4.30
Base Rate: 4.30

Subtotal 20.83
Total Charged 20.83
ANEX 20.83

<23-901980128-99>
ANEX <4390311587>
ACCT. NUMBER TRANS # AUTH
XXXX XXXX XXX2 008 551 583708

Thanks.
It's a pleasure to serve you.

ALL SALES FINAL ON STAMPS AND POSTAGE.
REFUNDS FOR GUARANTEED SERVICES ONLY.

A007948

The Law Firm of Carl B. Grant, P.A.

ATTORNEY AT LAW

Member:

South Carolina Bar
Maryland Bar

Columbia Office:

5509 N. Main Street
P.O. Box 3547
Columbia, SC 29203
(803) 754-7411
(803) 754-4593 (FAX)

960 Doyle Street

P.O. Box 1203

Orangeburg, SC 29116-1203

(803) 536-4011

(803) 536-4163 (FAX)

Areas of Practice:

Personal Injury
Criminal Defense
Workers' Compensation
Medical Malpractice
Family Law
Contracts
Military Law
General Law

Jerrold A. Anderson, Esquire

Via Facsimile (864) 260-6348 and (843) 355-9321

December 8, 2005

The Honorable Clifton Newman

P.O. Box 516

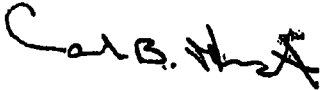
Kingstree, South Carolina 29556-0516

Re: State of South Carolina vs. Mikal Deen Mahdi
Notice of Motion and Motion for Continuance of Trial

Dear Judge Newman:

Enclosed please find the filed copy of the Notice of Motion and Motion for Continuance of Trial for the above referenced case. If you have any questions, please give me a call. With kind regards, I am

Sincerely,



Carl B. Grant
Attorney at Law

CBG/kwg

Enclosure

cc: Glenn Walters, Esquire

**DEFENDANT'S
EXHIBIT**

39-11 16 20 04-164

A007949

STATE OF SOUTH CAROLINA)

IN THE COURT OF GENERAL SESSIONS
FOR THE FIRST JUDICIAL CIRCUIT

COUNTY OF CALHOUN)

The State of South Carolina,)

Plaintiff,)

vs.)

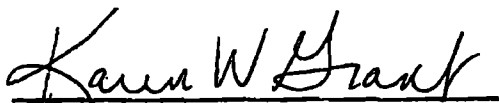
Mikal Deen Mahdi,)

Defendant.)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on December 8, 2005, I served the Notice of Motion and Motion for Continuance of Trial on David Pascoe, Solicitor for the First Judicial Circuit in the above captioned case by hand-delivering a copy of said document to his office at the following address:

David Pascoe, Solicitor
190 Gibson Street
Orangeburg, South Carolina 29115



Karen W. Grant
Legal Assistant
The Law Firm of Carl B. Grant, P.A.

STATE OF SOUTH CAROLINA

COUNTY OF CALHOUN

FILED
2005 DEC 8 A 4:45

IN THE COURT OF GENERAL SESSIONS
FOR THE FIRST JUDICIAL CIRCUIT

The State of South Carolina,

Plaintiff,

vs.

Mikal Deen Mahdi,

Defendant.

KENNETH HASTY
CLERK OF COURT
CALHOUN COUNTY
SOUTH CAROLINA

Indictment Nos.: 2004GS09-0242;
2004GS09-0244; 2004GS09-0243

NOTICE OF MOTION AND MOTION
FOR CONTINUANCE OF TRIAL

TO: DAVID M. PASCOE, SOLICITOR FOR THE FIRST JUDICIAL CIRCUIT:

PLEASE TAKE NOTICE THAT THE DEFENDANT, MIKAL D. MAHDI, will
move and hereby does move for a continuance of this case for the following reasons:

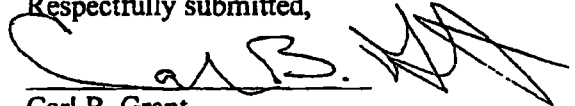
1. The order for approval of funding of the defense experts and investigators was signed by the court on October 26, 2005. This case is presently scheduled for trial the week of January 26, 2006. The defense experts and investigators have not had an adequate opportunity to complete there investigations of the defendant's family history, social background, psychological background, and numerous other records and materials that must be obtained to ensure that the defendant receives a fair trial and that he, if convicted, has a reliable sentencing proceeding pursuant to Wiggins vs. Smith, 539 U.S. 510 (2003), Rompilla V. Beard, 125 S. Ct. 2456 (6-30-05) and Terry Williams v. Taylor, 529 U.S. 362 (2000), and as guaranteed to him under the due process clauses of the Fifth and Fourteenth Amendments of the U.S. Constitution.

2. The sentencing stage in a capital murder case is often the most critical part of the defense preparation. Considering that the state is seeking the death penalty, the ultimate punishment, the defendant should be assured that his counsel has had every opportunity to prepare his complete defense and to ensure that he is indeed receiving the effective assistance of counsel and a fair trial.
3. This case involves the unusual circumstance where the defendant is alleged to have committed capital murder in South Carolina while his relatives and friends reside in North Carolina, Virginia, Maryland, New Jersey, Pennsylvania, and possibly other states. The defendant also has a brother who is enlisted in the U.S. Army who is now deployed in Afghanistan. These people must be interviewed as possible witnesses for the sentencing proceeding, if necessary. The defendant is from Lawrenceville, Virginia. Consequently, the defense mitigation team needs to travel to Virginia, and possibly other states, to obtain background information, records, and any other relevant materials that would serve to mitigate the punishment of the defendant if he is convicted. Please see the attached affidavit of S. Mark Rabil, Esquire, Assistant Capital Defender with the Forsyth Regional Office of the North Carolina Office of the Capital Defender, and that of Janet M. Holahan, Capital Case Investigator of the same office. Those affidavits are attached to this motion and incorporated herein by reference as further grounds for this motion for continuance. To date, none of the information outlined in Ms. Holahan's affidavit that must be obtained for the defendant to

have a reliable sentencing proceeding under the Fifth and Fourteenth Amendments of the U.S. Constitution has been obtained by the defense mitigation team.

4. Accordingly, in order for the defendant to receive the effective assistance of counsel and a reliable sentencing proceeding, the defense moves that the above case is continued from the week of January 23, 2006 to the week of January 23, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C.B. Grant', is written over a horizontal line.

Carl B. Grant
Attorney for the Defendant

Orangeburg, South Carolina
December 8, 2005

NORTH CAROLINA)

FORSYTH COUNTY)

AFFIDAVIT OF S. MARK RABIL

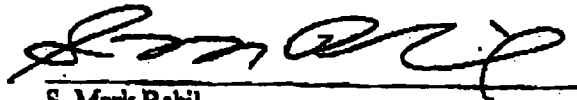
AFFIANT, BEING DULY SWORN, DEPOSES AND STATES AS FOLLOWS:

1. I am S. Mark Rabil and I reside in Winston-Salem, North Carolina. I am an Assistant Capital Defender with the Forsyth Regional Office of the N. C. Office of the Capital Defender. Our office represents individuals charged with first-degree murder and who are facing the possibility of the death penalty. I have been employed in this position since May, 2003. Prior to that, I was employed in the private practice of law from 1980 until 2003. In my 25 years of experience, I have represented dozens of clients charged with first-degree murder, and I have represented clients in several capital trials to verdict. I am also extensively involved in consulting with other attorneys representing clients facing capital murder charges, and I have served as an instructor several times at the Capital College sponsored by the North Carolina Academy of Trial Lawyers. I have attended several national death penalty defense seminars in recent years.
2. I am familiar with the standards required of attorneys representing clients charged with capital murder. The standards in North Carolina and South Carolina are the same, and are the standards discussed in the ABA Guidelines for the Appointment and Performance of Defense Counsel In Death Penalty Cases ([see www.abanet.org/deathpenalty](http://www.abanet.org/deathpenalty)) and by the U.S. Supreme Court in Wiggins v. Smith, 539 U.S. 510 (2003), Rompilla v. Beard, 125 S.Ct. 2456 (6-30-05) and (Terry) Williams v. Taylor, 529 U.S. 362 (2000).
3. In addition to the homicide charge pending in South Carolina, Mikal Mahdi is accused of a homicide that occurred in Winston-Salem, North Carolina in July 2004. I was appointed to represent Mr. Mahdi in that case. However, Mr. Mahdi has not been served with a warrant in that case and he has not yet been indicted by a grand jury. Consequently, at this time, the North Carolina Administrative Office of the Courts will not approve the appointment of professionals, such as investigators, social worker, psychologists, psychiatrists and other experts to assist the defense in this case. Thus, we have only been allowed to work on this case as a tentative case without expert assistance. Our role has merely been to maintain contact with the client, who has been incarcerated in South Carolina, and to locate and maintain contact with some of his family members, who reside in Virginia, Maryland, Texas, New Jersey and Pennsylvania, and a brother who is enlisted in the U.S. Army, and who is now deployed in Afghanistan. The client's father does not have a telephone. The client's mother is mentally ill and we have not yet been able to communicate with her. Our main contact with the client's family has been his 86 year old grandmother who lives in Lawrenceville, Virginia, approximately a 3.5 hour drive from our office.

4. Since July 2004, I have tried to maintain contact with the attorneys representing Mr. Mahdi in South Carolina. This contact has primarily been by telephone. The process has been made more difficult because of the changes in South Carolina defense counsel, due to conflicts or other questions. Recently, I was finally able to speak with and meet the current attorneys for Mr. Mahdi in South Carolina. It appears that the South Carolina attorneys have recently begun to obtain expert assistance in the case, such as a mitigation investigator, social worker and private investigator. However, in my opinion, full and complete preparation, will take at least another year from this point. The length of time for preparation in this case is based upon the records and individuals located in other states and countries. My opinion is also based upon my experience in investigating capital cases over the years. I frequently see that the review of one set of records can lead to the discovery of the need for another set of records, or for more complete records. Usually, in order to insure that we have complete records, an investigator or social worker must be sent to the institution or facility or institution to conduct an on-site comparison or review. Similarly, speaking with one witness or family member generates the names of other significant witnesses. This can take a great deal of time, even in the best of circumstances when all the records and witnesses are in one state or region, as is not the case here.
5. I have reviewed the Affidavit of Janet M. Holahan, the Capital Case Investigator for our office. I am in complete agreement with her assessment of the work that still needs to be completed in this case, and with her opinion that another year of work needs to be done. The amount of time is dictated by the interstate nature of the case, with crimes charged in two states, and with family and witnesses located in several states and a brother enlisted in the Army who is deployed to Afghanistan. As indicated by Ms. Holahan in her Affidavit, it is imperative that a mitigation investigator identify and obtain all the relevant records and evidence, and locate and interview all of the possible witnesses described above. Some of these witness interviews may be difficult, especially the interview/deposition of the client's brother, who is in the Army serving in Afghanistan, and the client's mother, who is mentally ill. There are also a number of school, prison, probation/parole and medical/psychiatric records that need to be obtained. I understand, for example, that Mr. Mahdi may have been an inpatient at psychiatric hospital in Maryland when he was very young.
6. In my opinion, the South Carolina defense attorneys for Mr. Mahdi cannot possibly comply with the minimum standards or dictates of the ABA Guidelines or Supreme Court case law if they are forced to trial in this capital case in January 2006. I respectfully suggest that the case must not be set for trial for at least another year.

FURTHER, AFFIANT SAYETH NOT.

This the 1st day of December, 2005.



S. Mark Rabil
N. C. Bar No. 9427
Assistant Capital Defender
Office of the Capital Defender
Forsyth Regional Office
P. O. Box 20308
Winston-Salem, NC 27102-0308
Tel. 336-761-2503

Sworn to and subscribed before me
This, the 1st day of December, 2005.

Janet M. Holahan
Notary Public



My Commission Expires: 4/25/2007

NORTH CAROLINA)

FORSYTH COUNTY)

AFFIDAVIT OF JANET M. HOLAHAN

AFFIANT, BEING DULY SWORN, DEPOSES AND STATES AS FOLLOWS:

1. I am Janet M. Holahan and I reside in Winston-Salem, North Carolina. I am the Capital Case Investigation for the Forsyth Regional Office of the N. C. Office of the Capital Defender. I have been employed in this position since May, 2003. Prior to that, I was employed as a criminal paralegal with S. Mark Rabil, Attorney At Law, Winston-Salem, N.C., and I primarily assisted with the investigation and preparation for death penalty trials.
2. As Capital Case Investigator, my responsibilities include: working closely with the defense attorneys in determining the types of information needed in order to prepare for the possible penalty phase of the trial; reviewing all the discovery provided in the case, including law enforcement reports, autopsy records, photographs and other matters; obtaining copies of many different types of records and documents, as discussed below; maintaining regular contact with the clients and their families; working with the client's family, friends and acquaintances in order to obtain the full story of the client's life; locating photographs, recordings or other evidence to assist with the presentation of the client's case at trial; working closely with experts appointed to assist in the investigation and presentation of the client's case, including work with mitigation specialists, social workers, psychologists, psychiatrists, counselors and private investigators; identifying factors in the client's background or circumstances that require expert evaluations; providing background materials and information to experts to enable them to perform competent and reliable evaluations; consulting with the attorney(s) regarding the development of the theory of the case and case strategy, thereby assuring coordination of the strategy for the guilt-innocence phase with the strategy for the penalty phase; identifying potential penalty phase witnesses; and working with the client, the client's family and the potential witnesses while the case is pending.
3. I have attended numerous training sessions and workshops concerning the duties and responsibilities of mitigation investigators. Thus, I am familiar with the standard practices required of mitigation investigators in capital cases.

4. The mitigation investigator shall obtain other records related to the client, and his or her family, including, but not limited to:

Birth certificates;

Birth records from hospital and physician;

Parents' medical records'

Medical records from childhood and adults years for any hospitalization or treatment, including emergency room records, records of physical examinations and records of any testing, including laboratory, EEG, ECK, CT scans or MRI scans;

School records, including transcripts or other performance records, testing, conduct, health screening, immunizations, multi-disciplinary assessments, and the individualized education plans, for every school attended;

Social service agency records for any agency that has worked with the client or any member of his or her family, including welfare or public assistance records; evaluations or testing, counseling, intervention, placement or treatment records;

Juvenile court and juvenile probation/court services records, including petitions, dispositional reports, evaluations, supervision records, referrals for services or placement and progress notes;

Records from any juvenile facility or home, including foster home, in which the client may have been placed, including admission records, progress reports, evaluations, education, medical and conduct records, discharge summaries;

Employment records for all jobs held, including applications, pay records, job descriptions, attendance, performance evaluations, name of employer or supervisor, starting and ending date, and reason for leaving job;

Military records, including complete record of conduct, places stationed, training, duty, medical, any awards or medals, and for persons serving in Vietnam, Desert Storm or any other war, combat chronologies and daily action reports for their unit;

Adult education records, including GED, post-secondary education, such as vocational school, college, Job Corps, or other training program;

Prior jail records, including charges, conduct, health, work assignments, or programming;

Prior prison records, including assessment, classification, conduct, work assignments, participation in programs or services, progress reports, parole reviews and planning, medical, visiting lists, and awards of good time;

Prior pre-sentence investigation reports and sentencing transcripts;

Prior probation and/or parole records including conditions of supervision, violations, performance on supervision, and services provided;

Treatment records, including records of any inpatient or outpatient psychiatric, mental health, or alcohol and drug treatment provided, including assessment, treatment, and discharge records;

And jail records for current incarceration, including conduct, health, work, programming, and visiting lists.

5. In addition to the records described above, the mitigation investigator should obtain other documents and items that illustrate the client's life, including such items as family photographs; samples of art work; writings; certificates; badges; trophies; or other evidence of awards or achievements.
6. The mitigation investigator shall interview the client to obtain detailed social history information, and to ascertain the names or identities of collateral sources of information. Information that should be obtained from the client regarding his childhood should include, but not be limited to:

Information regarding his or her birth, including date and place of birth, any knowledge he or she might have regarding the mother's pregnancy, the circumstances of the birth, any complications of delivery or birth trauma, health at birth;

Early developmental history, including age at which the client learned to walk and talk, and was toilet-trained;

Make-up of the family unit, including background information on birth parents and or adoption or step parents or guardians (date and place of birth, educational attainment, health history, date of marriage, ages at time of marriage, etc.), age and sex of siblings, prior marriages and children or parents;

Early health of client, including whether the client suffered any serious accidents, illnesses, and injuries;

Residential history of the family, including where they lived, for what periods of time, and under what conditions;

Employment history of parents;

Educational history, including date at which the client entered school, schools attended, performance and behavior, performance on standardized tests, any special services provided, level attained, activities in which the client may have participated, favorite subjects, and names of teachers that the client remembers;

Religious training, practices, and beliefs;

Discipline in the home, including the form of discipline, how administered, frequency, by whom, and for what;

Family relationships, including the nature and quality of the client's relationship with each parent, sibling, and relatives or other significant persons, and the relationship between the parents;

Friends and leisure activities;

Other significant relationships;

Community activities, including such things as sports, scouts, music, and other activities;

Jobs held as a youth, including lawn work, newspaper routes, babysitting or other odd jobs;

Any significant childhood experiences, including such things as death or serious injury of a family member or other significant person, divorce of parents, abandonment by parent, family violence, parental alcohol or drug abuse, abuse of the client, including physical, sexual, or emotional abuse, and exposure to violence in the community;

History of any alcohol or drug use;

History of running away;

Juvenile record, including any times the client was taken into custody, petitioned in Juvenile Court, adjudicated, dispositional orders and services or treatment provided.

In addition, the client should be interviewed on how he or she perceived of themselves as a child, in terms of personality, behavior, feelings, responses to various events in life, and relationship with others.

7. The client shall be interviewed regarding his or her adult years, and experiences as an adult, including, but not limited to:

Residential history, including where lived, with whom, for what lengths of time, and under what circumstances;

Employment history, including name of company or person for whom the client worked, dates of employment, description of job and duties, pay, performance on the job, names of persons family with his or her work, reasons for leaving the job, and any significant job experiences;

Education, including college, vocational school, Job Corps, or any other type of training or educational program;

Military history, including branch of service, dates of service, training, classification, where stationed, conduct, awards or medals, duties, whether in combat, and any significant experiences;

Health, including physical and mental health, any serious accidents or illnesses, treatment received, location of treatment and names of treating medical professionals, any chronic or acute symptoms experienced;

Alcohol and drug history, including substances used, frequency and amounts, affects produced by use, any treatment sought or received, names of person who can corroborate use;

Significant relationships, including marriages, children, and the nature and quality of these relationships;

Exposure to violence in the community, including experiences of traumatic loss, being the subject of violent assault, and witnessing violence;

Sexual development, practices, and relationships;

Names of friends and manner in which leisure time spent;

Legal history including arrests, convictions, circumstances surrounding prior offenses, experiences on probations, parole, or in jail or prison, and experiences with the police;

Religious, political, and cultural practices and beliefs.

In addition the client should be interviewed regarding how he or she perceived of themselves as an adult, in terms of personality, behavior and feelings, and how they perceived their relationship with others.

8. The mitigation investigator shall conduct collateral interviews with family members and others to supplement and corroborate the information obtained from the client. Persons who should be interviewed include, but are not limited to: parents; siblings; spouses or significant others; children; other relatives such as grandparents; aunts and uncles; cousins; childhood and adult friends and neighbors; school personnel, including teachers, principals, guidance counselors, social workers, psychologists, coaches; ministers or other church personnel; employers, job supervisors and co-workers; social service and court personnel, including juvenile or adult probation/parole officers; other service providers, such as counselors; physicians or medical personnel who have treated the client; jail and correctional institution staff; law enforcement personnel; mental health professionals who have assessed client at any time in the past or for purposes of the present proceeding, or who have provided treatment to the client.
9. Certain cases present special cultural issues that must be researched and considered at every step of the process, including: communication with the client and family; assessment of the client's conduct in the offense, with law enforcement, and during incarceration; investigation of background, circumstances, behavior and characteristics of the client; demeanor in court; and presentation of evidence in the penalty phase and at sentencing.
10. The mitigation investigator must maintain ongoing consultation with the attorney(s) on the case, keeping them informed of the results of the investigation, and consulting on the implications of the results for case strategy. Information obtained can affect considerations regarding competency to process or mental responsibility for the offense, plea negotiations, the manner in which the defense team relates to the client, decisions regarding jury selection, whether or not the client should testify, decisions regarding the need for expert evaluations, and selection of witness for the trial including penalty phase.
11. The mitigation investigator should generally prepare a comprehensive social history report containing the information obtained in the investigation. The report is used by the attorney in developing case strategy and determining who should be witnesses; may be provided to experts performing assessments so that they have adequate background information to conduct a competent evaluation; and, in some cases, may be furnished to the court.
12. The mitigation investigator should be retained and should begin work on the case, at the inception of the case or as early in the process as possible. Results of the social history investigation may have a bearing on decisions regarding competency to proceed, need for expert evaluations, need for medical treatment or other services in the jail while the case is pending, motion practice, and plea negotiations. It is important that the mitigation investigator conduct sufficient

social history investigation early in the process to assist the attorneys in determining the need for other expert assessments, including what type of assessments are indicated.

13. The nature and extent of the investigation and assessment necessary to adequately prepare for a capital murder trial, including penalty phase, generally requires a minimum of six months to a year. Factors affecting the length of time and number of hours necessary to prepare include, but are not limited to: the nature and complexity of the case; the age of the client; the prior history of the client including such things as prior offense history, prior incarcerations, history of significant physical or mental health problems, military history, lengthy employment history, frequent changes in residence and schools; the extent of records and documentation that exist, and difficulties in locating and obtaining records; the number of collateral interviews that must be conducted; the existence of special conditions, factors or issues that must be researched and considered; the need to address victim impact evidence; conditions of confinement; the difficulty in obtaining, scheduling and completing expert assessments; the extent of travel involved to investigate and to interview the defendant and collateral sources; other professional commitments of the mitigation investigator; and specific jurisdictional procedures or practices. Cases in which a number of these factors exist will often require at least one year, and sometimes more to prepare.
14. The social history investigation must be conducted and developed by a professional skilled at eliciting personal information from the client and others, particularly information of a private and sensitive nature. The person conducting the investigation must have the training, knowledge, and skills to detect the possible presence of significant factors such as: neurological impairment; cognitive disabilities; physical, sexual or psychological abuse; substance abuse; mental disorders; and other factors which influence the development of the client's personality and behavior. Denial, repression, and a sense of privacy are factors that inhibit the ability to fully disclose critical information. The mitigation investigator possesses the necessary knowledge and skills to assist the client and others in bring to the surface and to reveal repressed memories and sensitive information. Information obtained in the investigation must be documented, corroborated, developed, and analyzed in a manner which explains the client's behavior in light of his or her life history, including psycho-social and physical development. The mitigation investigator has the requisite training, knowledge, and skills, not generally possessed by attorneys, to perform the duties described in this affidavit.

15. Mikal Mahdi is accused of a homicide that occurred in Winston-Salem, North Carolina in July 2004. Our office was appointed to represent Mr. Mahdi in that case. However, Mr. Mahdi has not been served with a warrant in that case and he has not yet been indicted. Consequently, the North Carolina Administrative Office of the Courts will not approve the appointment of professionals, such as investigators, social worker, psychologists, psychiatrists and other experts. Thus, we have only been allowed to work on this case as a tentative case without expert assistance. Our role has merely been to maintain contact with the client, who has been incarcerated in South Carolina, and to locate and maintain contact with some of his family members, who reside in Virginia, Maryland, Texas, New Jersey and Pennsylvania, and a brother who is enlisted in the U.S. Army, and who is now deployed in Afghanistan. The client's father does not have a telephone. The client's mother is mentally ill and we have not yet been able to communicate with her. Our main contact with the client's family has been his 86 year old grandmother, Mrs. Nancy Burwell, who lives in Lawrenceville, Virginia, approximately a 3.5 hour drive from our office.

16. In order to properly prepare for the trial of this case, it is imperative that a mitigation investigator identify and obtain all the forgoing records and evidence, and locate and interview all of the possible witnesses described above. Some of these witness interviews may be difficult, especially the interview/deposition of the client's brother, who is in the Army serving in Afghanistan, and the client's mother, who is mentally ill. Given the information that I obtained to date, it is my opinion that preparation for the mitigation phase of this trial will take at least a year.

FURTHER, AFFIANT SAYETH NOT.

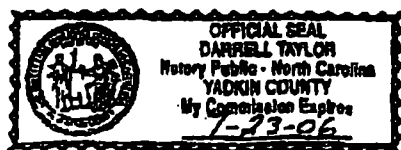
Janet M. Holahan

Janet M. Holahan
Capital Case Investigator
Office of the Capital Defender
Forsyth Regional Office
P. O. Box 20308
Winston-Salem, NC 27102-0308

Sworn to and subscribed before me
This, the 15th day of December, 2005.

Darrell Taylor
Notary Public

My Commission Expires: 7-23-2006



A007964

The Law Firm of Carl B. Grant, P.A.

ATTORNEY AT LAW

960 Doyle Street

P.O. Box 1203

Orangeburg, SC 29116-1203

(803) 536-4011

(803) 536-4163 (FAX)

Member:

South Carolina Bar
Maryland Bar

Columbia Office:

5509 N. Main Street

P.O. Box 3547

Columbia, SC 29203

(803) 754-7411

(803) 754-4593 (FAX)

Areas of Practice:

Personal Injury

Criminal Defense

Workers' Compensation

Medical Malpractice

Family Law

Contracts

Military Law

General Law

Jerrold A. Anderson, Esquire

Hand-Delivered

December 8, 2005

David Pascoe, Solicitor

190 Gibson Street

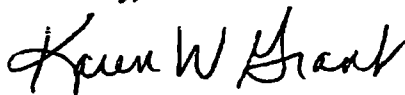
Orangeburg, SC 29115

Re: State of South Carolina vs. Mikal Deen Mahdi
Notice of Motion and Motion for Continuance of Trial

Dear Mr. Pascoe:

I hereby serve upon you the Notice of Motion and Motion for Continuance of Trial for the above referenced case. With kind regards, I am

Sincerely,



Karen W. Grant

Legal Assistant

/kwg

Enclosure

cc: Glenn Walters, Esquire

The Law Firm of Carl B. Grant, P.A.

ATTORNEY AT LAW

Member:
South Carolina Bar
Maryland Bar

Columbia Office:
5509 N. Main Street
P.O. Box 3547
Columbia, SC 29208
(803) 754-7411
(803) 754-4593 (FAX)

960 Doyle Street
P.O. Box 1203
Orangeburg, SC 29116-1203
(803) 536-4011
(803) 536-4163 (FAX)

Areas of Practice:
Personal Injury
Criminal Defense
Workers' Compensation
Medical Malpractice
Family Law
Contracts
Military Law
General Law

Jerrold A. Anderson, Esquire

DATE:

12/8/05

PAGES TO FOLLOW INCLUDING COVER SHEET:

17

TO:

The Honorable Clifton Newman

COMPANY:

TELEPHONE NUMBER:

864-260-6348 and (843) 355-9301

FROM: Carl B. Grant NUMBER: (803) 536-4011

COMMENTS:

RE: Notice of Motion and Motion
For Continuance of Trial

State of SC vs. Mikal Deen Mahdi

WARNING: The pages comprising this facsimile transmission contain confidential information from The Law Firm of Carl B. Grant, P.A. This information is intended for use by the individual entity named as the recipient hereof. If you are not the intended recipient, be aware that any disclosure, copying, distributions, or use of the contents of this transmission is prohibited. If you receive this transmission in error, please notify us by telephone immediately so we may arrange to retrieve this transmission at no cost to you.

The Law Firm of Carl B. Grant, P.A.

ATTORNEY AT LAW

Member:

South Carolina Bar
Maryland Bar

Columbia Office:

5509 N. Main Street
P.O. Box 3547
Columbia, SC 29203
(803) 754-7411
(803) 754-4593 (FAX)

960 Doyle Street
P.O. Box 1203
Orangeburg, SC 29116-1203
(803) 536-4011
(803) 536-4163 (FAX)

Areas of Practice:

Personal Injury
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Contracts
Military Law
General Law

Jerrold A. Anderson, Esquire

Via Facsimile (864) 260-6348 and (843) 355-9321

December 8, 2005

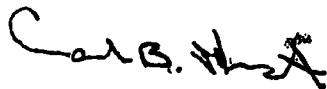
The Honorable Clifton Newman
P.O. Box 516
Kingstree, South Carolina 29556-0516

Re: State of South Carolina vs. Mikal Deen Mahdi
Notice of Motion and Motion for Continuance of Trial

Dear Judge Newman:

Enclosed please find the filed copy of the Notice of Motion and Motion for Continuance of Trial for the above referenced case. If you have any questions, please give me a call. With kind regards, I am

Sincerely,



Carl B. Grant
Attorney at Law

CBG/kwg

Enclosure

cc: Glenn Walters, Esquire

**DEFENDANT'S
EXHIBIT**

002

 3-9-11 17 04-164
LO

STATE OF SOUTH CAROLINA)

COUNTY OF CALHOUN)

The State of South Carolina)

Plaintiff,)

vs.)

Mikal Deen Mabdi)

Defendant,)

 IN THE COURT OF GENERAL SESSIONS
FOR THE FIRST JUDICIAL CIRCUIT

 Indictment Nos.: 2004GS09-0242;
2004GS09-0244; 2004GS09-0243

 ORDER FOR CONTINUANCE
OF TRIAL

 KENNETH HASTY
CLERK OF COURT
CALHOUN COUNTY
S.C. MATTHEWS, SC

2006 JAN - 3 P 12:33

FILED

This matter came before me on motion of the Defendant, Mikal D. Mahdi, by and through his undersigned counsel, Carl B. Grant, for a continuance of the above captioned case. The motion for continuance was filed with the Calhoun County Clerk of Court on December 8, 2005, and served on the Solicitor, David M. Pascoe the same day. I had a conference call with the attorneys about the motion on December 9, 2005 and discussed the substance of the motion with them.

This case is presently scheduled for trial in Calhoun County the week of January 23, 2006. Mr. Grant revealed during the conference call that the defense experts and investigators had not had an adequate opportunity to complete their investigation of the Defendant's family history, social background, psychological background, and numerous other records and materials that must be obtained and investigated to insure that the Defendant receives a fair trial and that he, if convicted, has a reliable sentencing proceeding pursuant to Wiggins vs. Smith, 539 U.S. 510 (2003), Rompilla v. Beard, 125 S. Ct. 2456 (6/30/05) and Terry Williams v. Taylor, 529 U.S. 362 (2000), and as

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guaranteed to him under the due process clauses of the Fifth and Fourteenth Amendments of the U.S. Constitution.

The court is aware that the sentencing stage in a capital murder case is often the most critical part of the defense preparation. The court has also been informed by the defense counsel that this case involves the unusual circumstance were the Defendant is alleged to have committed capital murder in South Carolina, while his relatives and friends reside in North Carolina, Virginia, Maryland, New Jersey, Pennsylvania, and possibly other states. Furthermore, the defendant has a brother who is enlisted in the U.S. Army who is now deployed in Afghanistan. After hearing the arguments, information and discussions presented by the prosecution and the defense during the conference call, I have decided that there is good cause to grant the Defendant's motion for continuance in this case.

ACCORDINGLY, IT IS HEREBY ORDERED that this case is continued from its original trial date of the week of January 23, 2006. It is further ordered that the Court will conduct a status conference at the Sumter County Courthouse during the week of January 30, 2006 to consider appropriate pretrial matters and set a new trial date.

IT IS SO ORDERED:


Clifton Newman
Presiding Circuit Court Judge

December 28, 2005

Kingstree, South Carolina

**DEFENDANT'S
EXHIBIT**

3-9-11 18 04-164
LO

EXHIBIT B

**THE STATE OF SOUTH CAROLINA V. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-242, 243, 244
TIME SHEET FOR GLENN WALTERS, ESQUIRE**

DATE	SERVICES RENDERED	HOURS	
		IN COURT	OUT OF COURT
07/01/2005	Appointed to case		
07/01/2005	Motion Hearing- Relieving Counsel-Appointing Co-Counsel	2.00	
09/15/2005	Travel from Orangeburg to Columbia		1.30
09/15/2005	Meeting with Client (Kirkland)		1.40
09/15/2005	Travel from Columbia to Orangeburg		1.30
09/22/2005	Review of file		5.00
09/30/2005	Travel from Orangeburg to Columbia		1.30
09/30/2005	Research for Motion		5.00
09/30/2005	Meeting with Client (Kirkland)		1.40
09/30/2005	Travel from Columbia to Orangeburg		1.30
09/30/2005	Case Preparation		3.00
10/06/2005	Conference call with Judge Newman		1.00
10/11/2005	Case Preparation (Review Motions)		2.50
10/26/2005	Case Preparation		5.00
11/22/2005	Case Preparation/Meeting with Solicitor and Co-Counsel		1.00
11/22/2005	Phone call to Experts		0.50
11/28/2005	Phone Call to Judge Newman		1.00
12/09/2005	Conference call with Judge Newman		0.75
12/14/2005	Meeting with Donald Girndt Case Preparation		4.50
12/28/2005	Case Preparation		3.50
01/05/2006	Meeting with Donald Girndt and Co-Counsel		1.25
01/18/2006	Travel from Orangeburg to Columbia		1.30
01/18/2006	Review Forensic File at SLED		2.50
01/18/2006	Travel from Columbia to Orangeburg		1.30
01/23/2006	Travel from Orangeburg to Columbia		1.30
01/23/2006	Meeting with Client (Kirkland)		2.00
01/23/2006	Travel from Columbia to Orangeburg		1.30
01/24/2006	Case Preparation		4.00
Page 1: TOTAL		2.00	55.70

DATE	SERVICES RENDERED	HOURS	
		IN COURT	OUT OF COURT
01/25/2006	Meeting with Co-Counsel and Experts		4.50
01/29/2006	Case Preparation		7.00
02/03/2006	Travel from Orangeburg to Winston-Salem, NC		10.50
02/10/2006	Case Preparation		6.25
02/15/2006	Case Preparation		6.25
02/28/2005	Case Preparation		5.00
03/08/2006	Case Preparation		6.25
03/14/2006	Case Preparation		5.00
03/28/2006	Case Preparation		6.25
03/29/2006	Travel from Orangeburg to Columbia		1.30
03/29/2006	Meeting with Defense Team Experts and Co-Counsel		2.50
03/29/2006	Travel from Columbia to Orangeburg		1.30
03/30/2006	Case Preparation		4.25
04/17/2006	Case Preparation		6.00
04/27/2006	Conference call with Judge Newman		0.75
04/28/2006	Case Preparation-Defense Team Meeting		1.00
05/03/2006	Telephone Conference with Defense Team		4.00
05/17/2006	Travel from Orangeburg to Columbia		1.30
05/17/2006	Meeting With Client (Kirkland)		2.00
05/17/2006	Travel from Columbia to Orangeburg		1.30
05/19/2006	Review of Motions		2.50
05/25/2006	Case Preparation		6.25
05/30/2006	Preparation of Master Witness List		4.50
06/01/2006	Case Preparation		5.00
06/09/2006	Case Preparation		6.25
06/21/2006	Travel from Orangeburg to St. Matthews		0.50
06/21/2006	Motion Hearing- Relieving Carl Grant as Counsel	0.35	
06/21/2006	Travel from St. Matthews to Orangeburg		0.50
06/22/2006	Review of Jackson v. Deno		1.00
06/30/2006	Case Preparation		6.00
07/06/2006	Review Motion to be Relieved filed by Atty. Harpotilian Re: Carl Grant		0.30
07/06/2006	Draft Motion to Appoint Additional Counsel		1.00
	Page 2: Total	0.35	116.50

DATE	SERVICES RENDERED	HOURS IN COURT	OUT OF COURT
07/07/2006	Travel from Orangeburg to St. Matthews		0.50
07/07/2006	Motion Hearing- Set Trial Date	0.40	
07/07/2006	Travel from St. Matthews to Orangeburg		0.50
07/15/2006	Meeting with Co-Counsel		~~5.00~~ 2.00
07/18/2006	Case Preparation		6.00
07/19/2006	Case Preparation		4.00
07/20/2006	Case Preparation		6.00
07/21/2006	Travel from Orangeburg to Columbia		
07/21/2006	Columbia		1.30
07/21/2006	Meeting with Client @ KCI		1.30
07/21/2006	Research at Law School Library		3.00
07/21/2006	Travel from Columbia to Orangeburg		1.30
07/28/2006	Case Preparation		6.00
08/06/2006	Preparation for Death Team Meeting		2.40
08/07/2006	Travel from Orangeburg to Columbia		1.30
08/07/2006	Review of Information @ Law School Library		3.00
08/09/2006	Review of File/Death T Team Meeting		4.00
08/16/2006	Preparation of Motions		6.00
08/17/2006	Preparation of Motions		3.30
08/18/2006	Review of Motions with Josh Koger		6.00
08/21/2006	Corrections made to Motions		2.00
08/22/2006	Review file & revised motions with Co-Counsel		4.50
08/23/2006	Case Preparation		5.00
08/30/2006	Travel from Orangeburg to St. Matthews		0.35
08/30/2006	PRETRIAL MOTIONS HEARING	4.00	0.00
08/30/2006	Travel from St. Matthews to Orangeburg		0.35
09/02/2006	Preparation of file for Death Team Meeting		1.30
09/03/2006	Travel from Orangeburg to Columbia		1.30
09/03/2006	Death Team Meeting		3.00
09/03/2006	Travel from Columbia to Orangeburg		1.30
09/04/2006	Case Preparation		4.50
09/06/2006	Travel from Orangeburg to Columbia		1.30
09/06/2006	Meeting with Client @ KCI		2.00
09/06/2006	Travel from Columbia to Orangeburg		1.30
09/12/2006	Case Preparation		6.00
09/20/2006	Travel from Orangeburg to Columbia		1.30
09/22/2006	Case Preparation		3.50
09/23/2006	Case Preparation		8.00
09/24/2006	Case Preparation		6.50
09/27/2006	Case Preparation		4.50
09/29/2006	Case Preparation		6.00
10/01/2006	Case Preparation		6.00
~~10/02/2006~~	~~PRETRIAL MOTIONS HEARING~~	~~0.30~~	
10/04/2006	Case Preparation		6.50
10/06/2006	Travel from Orangeburg to Lawrenceville, VA to meet Burwell		7.00

DATE	SERVICES RENDERED	HOURS	
		IN COURT	OUT OF COURT
10/06/2006	Meeting with Nancy Burwell		1.00
10/06/2006	Travel from Lawrenceville, VA to Orangeburg		7.00
10/07/2006	Case Preparation		4.00
10/08/2006	Review of File & Notes from Nancy Burwell		8.00
10/10/2006	Case Preparation		6.00
10/12/2006	Case Preparation		6.00
10/13/2006	Case Preparation		9.00
10/14/2006	Case Preparation		8.50
10/15/2006	Case Preparation		6.50
10/18/2006	Case Preparation		6.25
10/20/2006	Travel from Orangeburg to Columbia		1.30
10/20/2006	Meeting with Client @ KCI		2.00
10/20/2006	Travel from Columbia to Orangeburg		1.30
10/21/2006	Case Preparation		8.50
10/22/2006	Case Preparation		5.00
10/23/2006	Travel from Orangeburg to Columbia		1.30
10/23/2006	Meeting with Client @ KCI		1.45
10/23/2006	Travel from Columbia to Orangeburg		1.30
10/24/2006	Travel from Orangeburg to Columbia		1.30
10/24/2006	Meeting with Client @ KCI		2.00
10/24/2006	Meeting with Jeffrey Bloome		2.00
10/24/2006	Travel from Columbia to Orangeburg		
10/27/2006	Travel from Orangeburg to St. Matthews		0.25
10/27/2006	Meeting in Chambers re: Status of Case, etc.	1.50	
10/27/2006	Travel from St. Matthews to Orangeburg		0.25
10/28/2006	Case Preparation		7.25
10/29/2006	Meeting with Co-Counsel		4.00
10/30/2006	Travel from Orangeburg to Columbia		1.30
10/30/2006	Review of SLED Information		3.00
10/30/2006	Travel from Columbia to Orangeburg		1.30
10/30/2006	Case Preparation		4.50
10/31/2006	Travel from Orangeburg to Columbia		1.30
10/31/2006	Meeting with Client @ KCI (discuss shoes)		2.50

PAGE 4 TOTAL

1.5

115.35

A007973

DATE	SERVICES RENDERED	IN COURT	OUT OF COURT
10/31/2006	Travel from Columbia to Orangeburg		1.30
11/01/2006	Case Preparation		4.00
11/02/2006	Travel from Orangeburg to Columbia		1.30
11/02/2006	Meeting with Client @ KCI (discuss truck)		2.50
11/02/2006	Meeting with Co-Counsel		2.00
11/02/2006	Travel from Columbia to Orangeburg		1.30
11/04/2006	Meeting with Co-Counsel (Case Preparation)		8.00
11/07/2006	Travel from Orangeburg to Columbia		1.30
11/07/2006	Meeting with Client @ KCI		4.00
11/07/2006	Travel from Columbia to Orangeburg		1.30
11/08/2006	Case Preparation		4.50
11/09/2006	Travel from Orangeburg to Columbia		1.30
11/09/2006	Meeting with Client @ KCI		4.00
11/09/2006	Travel from Columbia to Orangeburg		1.30
11/10/2006	Case Preparation		4.00
11/11/2006	Meeting with Co-Counsel (Preparation for Expert Meeting)		8.00
11/14/2006	Travel from Orangeburg to Columbia		1.30
11/14/2006	Meeting with Experts		2.00
11/14/2006	Travel from Columbia to Orangeburg		1.30
11/15/2006	Travel from Orangeburg to Columbia		1.30
11/15/2006	Meeting with Client @ KCI		2.00
11/15/2006	Travel from Columbia to Orangeburg		1.30
11/15/2006	Meeting with Co-Counsel		5.00
11/16/2006	Meeting with Co-Counsel		2.00
11/17/2006	Travel from Orangeburg to Columbia		1.30
11/17/2006	Mock Jury Selection		7.00
11/17/2006	Travel from Columbia to Orangeburg		1.30
11/18/2006	Meeting with Co-Counsel		8.00
11/19/2006	Meeting with Co-Counsel (Case Preparation)		8.00
11/20/2006	Travel from Orangeburg to St. Matthews		0.25
	PAGE 5 TOTAL		92.15

DATE	SERVICES RENDERED	IN COURT	OUT OF COURT
11/20/2006	HRG: Motion to Supress & Other Pre-Trial Matters	3.00	
11/20/2006	Meeting with Co-Counsel (Case Preparation)		4.00
11/21/2006	Meeting with Co-Counsel (Case Preparation)		10.00
11/22/2006	Meeting with Co-Counsel Case Preparation		6.00
11/24/2006	Kelly Fite (Case Preparation)		10.00
11/25/2006	Meeting with Co-Counsel (Case Preparation)		10.00
11/26/2006	Travel from Orangeburg to Calhoun County to review Murder Scene		0.35
11/26/2006	Meeting with Co-Counsel re: murder scene		12.00
11/26/2006	Travel from Calhoun County to Orangeburg		0.35
11/27/2006	HRG: Jury Qualification	14.00	
11/28/2006	HRG: Jury Qualification	14.00	
11/29/2006	HRG: Jury Qualification	18.00	
11/30/2006	HRG: Court Appearance Client Pleads Guilty	10.00	
12/01/2006	Preparation for Sentencing Phase		8.00
12/02/2006	Review of Sentencing Material & Meeting w/ Client		10.00
12/03/2006	Meeting with Co-Counsel		10.00
12/04/2006	HRG: Sentencing Phase	8.00	
12/05/2006	HRG: Sentencing Phase	8.00	
12/06/2006	HRG: Sentencing Phase	8.00	
12/07/2006	Preparation of Memorandum		4.00
12/08/2006	HRG: Sentencing of Client		2.00

PAGE 6	TOTAL	83.00	86.70
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Travel Time

**THE STATE OF SOUTH CAROLINA V. MIKAL DEEN MAHDI
INDICTMENT NOS.: 2004GS09-242, 243, 244
TIME SHEET FOR GLENN WALTERS, ESQUIRE**

TOTAL IN-COURT HOURS:	91.55 X 125.00	\$11,443.75
TOTAL OUT-OF-COURT HOURS:	610.80 X 125.00	<u>\$76,250.00</u>
TOTAL		\$87,693.75
CASE EXPENSES:		
FED EX KINKO'S		\$1,019.72
CAROLINA SECURITY CONSULTANTS		<u>\$103.00</u>
TOTAL:		\$1,122.72
TOTAL ATTORNEYS FEES AND EXPENSES:		<u>\$88,816.47</u>

I HEREBY CERTIFY THAT THE ABOVE REFERENCED IS AN ACTUAL COMPILATION OF MY
BILLABLE HOURS AND EXPENSES.



GLENN WALTERS, ESQUIRE

DATE

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

2 Telephone call received A Telephone call made R Weekly review 2 Progress Review 2 Group Counseling C	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC O Other	Name <u>Mahdi, Mikal</u> DOB <u>Redacted</u> <u>Redacted</u> Living Unit <u>36</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
1/9/99	O	Counselor transferred to Counselor Amos. File reviewed.	BA
		8-10-99 ga	
11/99	GC	Mahdi attended Anger Control Group to be held weekly. Mahdi shows some participation which may increase with positive reinforcement.	TN
12/99	TR	Received Message from Mr. Sherif Mahdi	(X)
12/99	TM	Spoke w/ Mr. Mahdi parent concerned w/ Counselor Change. Will Call Ms. Whitaker, with question concerning this matter. # used Redacted	(J)
3/99	WR	Met w/ Mahdi on several occasions for an individual session. Mahdi upset and projecting anger toward this counselor but later apologized. Mahdi began Anger Control Group this week & shows promise for satisfactory participation. Encouraged Mahdi to stay focused.	BA

**DEFENDANT'S
EXHIBIT**

3971 14 14-104
LD

A007977

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with
C	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit 3B
 Assigned Counselor Amos

Date	Code	Entries	Initial
12/4/99	TT	for release (when the time comes.)	
	(cont.)	Advised Mikal he cannot complete those objectives if housed in the SOC.	
		Advised Mikal he should focus on his goal to get out of here. —	Bh
2/6/99	TR	Received another message from Mr. Mahdi, Mikal's father. —	Bh
2/6/99	TM	Returned Mr. Mahdi's call & left a message to call back. Advised Mr. Mahdi of this counselor's extension. —	Bh
		8-28-99 Ser	
0/99	IC	Met with Mahdi for individual counseling as part of Anger Control Group. —	TN
1/99	GC	Mahdi attended Anger Control Group. Participation seems to be appropriate. —	TN
1/99	IC	Met briefly w/ Mahdi & advised that due to the "lockdown," anger Control Group will meet tomorrow. Mahdi appeared to be in good spirits. Encouraged him	
	(late entry)		

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting	Name <u>Mahdi, Mikal</u>
Telephone call made	SP Service Plan Development	DOB <u>Redacted</u>
Weekly review	CSUV Court Visit	Living Unit <u>3B</u>
Progress Review	IC Individual Counseling	Assigned Counselor <u>Amos</u>
Group Counseling	CN Consultation with CRC	

Date	Code	Entries	Initial
1/1/99	IC	to maintain.	Ba
	(etc entry)		
3/99	IC/WR	met w/ Mahdi. He had no questions or concerns for this counselor. Overall, Mahdi is doing well. He participated in Anger Control Group w/ satisfactory participation. Mahdi remains charge-free.	Ba
1/99	PR	This counselor witnessed Mahdi being carried by three officers to the Special Housing Unit as he attempted to assault an officer. Major offense pending.	Ba
1/99	TM	This counselor called Mahdi's father & advised him that due to the pending charge & being housed in SHU, Mikal will not be eligible for a visit this Sunday, 9/12/99.	Ba

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

R Telephone call received	TT Treatment Team Meeting
M Telephone call made	SP Service Plan Development
VR Weekly review	CSUV Court Visit
IR Progress Review	IC Individual Counseling
GC Group Counseling	CN Consultation with
RC	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit 3B
 Assigned Counselor Anas

Date	Code	Entries	Initial
7/8/99	GC	Met with Mahdi for Anger Control Group. Participation was improved and very positive.	TN
late entry			
7/9/99	IC	Unable to meet with Mahdi for individual counseling for Anger Control as he is in isolation.	TN
10/79	WR	This counselor unable to meet w/mikal today as all cadets on lockdown & mikal in Special Housing. Mikal will more than likely be expelled from the Anger Control Group depending on his offenses received. Mikal's behavior has been unpredictable & inconsistent. He appeared to be focused on his release until the incident occurred.	Pa
3/99	IC	This counselor met w/mahdi for an individual session. explained	

DISCONTINUED

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

TR Telephone call received TM Telephone call made WR Weekly review PR Progress Review GC Group Counseling RC	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC
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Name Mahdi, Mikal
 DOB Redacted
 Living Unit 3B
 Assigned Counselor Amos

Date	Code	Entries	Initial
7/15/99	TM	This counselor also attempted to reach Mr. Mahdi at work but he works the 11-7 shift Redacted	BH
7/16/99	TR	This counselor received a call from Mr. Mahdi who wanted to know Mikal's status. Advised him that Mikal received two major offenses on 9/9/99 and is still in isolation. Mr. Mahdi feels that we are trying to break Mikal's spirit. Assured him we are only holding Mikal accountable for his actions. —	BH
7/17/99	WR	Mikal remains in the Special Housing unit for receiving two major offenses on 9/9/99. He received a total of 240 hours of isolation.	BH

9-27-99 *for*

FILE 5
CROSSING

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

TR Telephone call received	TT Treatment Team Meeting	Name <u>Mahdi, Mikal</u>
TM Telephone call made	SP Service Plan Development	Redacted
WR Weekly review	CSUV Court Visit	DOB _____
PR Progress Review	IC Individual Counseling	Living Unit <u>3B</u>
GC Group Counseling	CN Consulation with	Assigned Counselor <u>Amos</u>
RC	CRC	

Date	Code	Entries	Initial
7/22/99	IC	(late entry). Met w/ Mikal for an individual session. Advised him that this counselor will be on vacation 9/23 + 9/24. Mikal apologized to this counselor for yesterday 9/21/99 as this counselor had to write him up for verbal threats. Mikal stated he knows he was wrong. Mikal wanted to know how long he will be in SOC & whether or not he could have a book. Advised it would confirm. _____	BA
9/23 -	0	This counselor will be on vacation. _____	BA
9/24			
9/28/99	IC	met briefly w/ Mahdi. Advised him that TT will be held tomorrow as he is serving Phd today. _____	BA

JUL 28 5 01 PM '99
DCC 307017

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

TR Telephone call received	TT Treatment Team Meeting
FM Telephone call made	SP Service Plan Development
NR Weekly review	CSUV Court Visit
PR Progress Review	IC Individual Counseling
GC Group Counseling	CN Consultation with
RC	CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit 3B
 Assigned Counselor Amos

Date	Code	Entries	Initial
7/29/99	TT	Mahdi attended Treatment Team for his monthly progress review but had to be removed and taken back to his pod as he became upset and began threatening to hit someone. Mahdi feels as though he is never going to go home; he feels staff is playing him. Mahdi fails to realize that he is responsible for his own actions.	BA
11/99	IC/WR	met w/ Mahdi for an individual session. He appeared very calm stating he was going to comply but the more he talked the madder he got. He began making suicidal statements but noted he would become homicidal first. He gave very	

ALL 3
DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consulation with
	CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit 3B
 Assigned Counselor Amos

Date	Code	Entries	Initial
5/1/99	IC/WR	graphic descriptions of how he would hurt others. He also graphically described how we would find him (i.e. "hanging") This counselor tried to calm Mahdi but he stated he had nothing else to say. This counselor spoke w/ Glen Skoler & Susanne Shynon re: the above. This counselor will complete a BSH referral. It is this counselor's opinion that Mahdi is "self-entitled" as he takes no responsibility for his own actions.	138
6/1/99	TR	Received call from Mr. Sherif Mahdi. He was calling in re: to Mikal's status. Advised him that Mikal is in Special Housing Unit due to receiving	

FILE 5
DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with
	CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit 3B
 Assigned Counselor Amos

Date	Code	Entries	Initial
2/6/99	TR (cont.)	several major offenses, and the latest being, an assault on staff. Mr. Mahdi feels the system is prejudice and that we're trying to break Mikal's spirit. He further stated that Virginia is full of white supremacists. Attempted to assure Mr. Mahdi that we are only holding Mikal accountable for his own actions. He requested to speak w/ Mrs. Whittaker. Advised Mrs. Whittaker and she returned his call. —	
6/99	TR/TM	Received call from Nancy Burwell, Mikal's grandmother. Returned her call. She is very concerned about Mikal. Advised her of his	

FILE 5
 DISCONTINUED

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

2 Telephone call received	TT Treatment Team Meeting
1 Telephone call made	SP Service Plan Development
R Weekly review	CSUV Court Visit
2 Progress Review	IC Individual Counseling
3 Group Counseling	CN Consultation with
C	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit Special Housing
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/16/99	TR/ITM (cont.)	status. also advised her that he is working w/ a psychologist. Assured her that we are here to help Mikal. She stated she believes in "law & order" but she feels something is really going on w/ him.	BF
1/16/99	CSUV	Mikal's P.O. visited him today.	BF
8/99	WR	Mikal remains in the Special Housing Unit on 5 minute Suicide Watch. Mr. Holland, CRC, has advised this counselor that he will be taking care of Mikal's immediate concerns while in Special Housing.	BF
1/99	"Other"	Mikal's father visited him today.	BF
	10-11-99	BF	

FILED
DISCOVERY

Department of Juvenile Justice
Pepper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with
C	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit SPECIAL HOUSING
 Assigned Counselor Armos

Date	Code	Entries	Initial
1/2/99	IC	This counselor met w/ Mikal for an individual session in Special Housing. We had a lengthy discussion regarding his negative behavior. Mikal admitted to feeling angry w/ the system. He feels he did not commit a crime "bad enough" to place him in the DJJ. Mikal often states that he only committed a "misdemeanor." As we continued to talk, Mikal would raise his voice and begin cursing. At such time, this counselor would point that out to him & Mikal would attempt to control himself. However, he has difficulty in doing so. For example, when the officer handed Mikal his dinner tray, Mikal looked	

**RULE 6
DISCOVERY**

**Department of Juvenile Justice
 Cooper Juvenile Correctional Center
 Running Case Record**

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with
C	CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit SPECIAL HOUSING
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/12/99	IC (cont.)	to see what was inside. When he looked inside, he didn't like what he saw. He began cursing and threw the tray back at the officer, dripping food juices on this counselor's pants. This counselor asked Mikal why he felt he needed to act that way. Advised that he could've simply informed the officer that he didn't like what was being served for dinner. Mikal apologized for dripping food on my pants but justified throwing the tray at the officer. He stated "they shouldn't be trying to feed us this bullshit." Advised Mikal to think of his actions. —————	BS

**RULE 5
 DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

TR Telephone call received TM Telephone call made WR Weekly review PR Progress Review GC Group Counseling RC	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC
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Name Mandi, Mikal
 Redacted
 DOB _____
 Living Unit _____
 Assigned Counselor Amos

Date	Code	Entries	Initial
6/17/99	CN	Counselor Amos spoke with Mikal's father during visitation. He expressed his concern/disappointment in Mikal not being able to have reading material related to his religious faith. I advised Mr. Mandi to forward any of his concerns @ this to Mr. Amos; but also suggested that he explain the type of content in which the book contained.	LS
7/1/99	C	Upon Mikal's arrival to visitation he was informed that he would have to be placed in a (special) meeting area because he is in SHU. He became a little irate, stood up and said he was not going anywhere. He did use profanity. St. Ampkin arrived immediately following that moment. After Mandi calmed down - his father (and mother) were allowed in the (special) meeting area.	

FILE 5
DEPT. OF JUV. JUST.

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

☐ Telephone call received	TT Treatment Team Meeting
☐ Telephone call made	SP Service Plan Development
☐ Weekly review	CSUV Court Visit
☐ Progress Review	IC Individual Counseling
☐ Group Counseling	CN Consultation with
☐ C	CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit SHU
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/30/99	TR	Received call from Mahdi's father requesting that this counselor call him back. —	BA
6/0/99	TM	Returned Mr. Mahdi's call Redacted and left a message to call back. Need to advise of Mahdi's status and that Mahdi not eligible for a visit this weekend. Next visit, 3 rd Sunday in November as Mahdi is in SOC ^{3rd cmu.}	BA
2/1/99	IC	Met w/ Mahdi. Advised that IRC tomorrow. Advised evaluation for placement taking place. —	BA
2/5/99	IRC	Mahdi attended IRC. IRC recommended that Mahdi remain in the Conduct Mgmt. Unit. Mahdi requested to speak to this counselor after IRC. Followed Mahdi to his cell in an attempt to talk to him.	

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
 DATE 11-13-03 BY 60322 JAY

Department of Juvenile Justice
 Cooper Juvenile Correctional Center
Running Case Record

☒ Telephone call received	☒ TT Treatment Team Meeting
☒ Telephone call made	☒ SP Service Plan Development
☒ Weekly review	☒ CSUV Court Visit
☒ Progress Review	☒ IC Individual Counseling
☒ Group Counseling	☒ CN Consultation with
☒ C	☒ CRC

Name Mahdi Mikal
 Redacted
 DOB _____
 Living Unit BMU
 Assigned Counselor Amos

Date	Code	Entries	Initial
12/1/99	1RC	but Mahdi threw his shoe at the officer escorting him. This counselor dismissed herself as he was obviously not in the right frame of mind to talk. —————	PH
12/1/99	1UR	Mahdi has been offense free since 10/3/99 but he continues to be very aggressive & assaultive in nature. He was written up right before 1RC and right after. Thus, he currently has two pending charges. —————	PH
12/1/99	GC	Met w/ Mahdi and introduced the "Case Team" (2 entry) "Case" Program for Amge Mgt, which he needs to complete so he may be considered for release. —————	PH
10-23-99	for		
1/6/99	TT	Mikal attended Treatment Team for a monthly progress review but was removed due to	

aggressive & threatening behavior
 RULES
 BROOKLYN

Department of Juvenile Justice
 Pepper Juvenile Correctional Center
Running Case Record

Telephone call received Telephone call made Weekly review Progress Review Group Counseling C	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC
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Name Mahdi, Mikal
 DOB Redacted
 Living Unit Cmu
 Assigned Counselor Amos

Date	Code	Entries	Initial
12/10/99	TT (cont.)	Mikal stated that he would "stab someone, hit someone, whatever" if he doesn't leave here once he completes Anger Control. This counselor attempted to explain to Mikal that all he has to do is remain offense free & complete anger control in order to be released but Mikal did not appear to want to hear me as he was talking over me. _____	Bl
12/9/99	O	Completed Mikal's bi-monthly progress report. _____	Bl
12/9/99	TM	This counselor called Mr. Mahdi Redacted _____ and left a message advising that Mikal is not eligible for a visit until the 3rd Sunday in November. _____	Bl
1/99	IC	This counselor met w/ Mikal for an individual session. Mikal	

JAMES
 11/30/2017

Department of Juvenile Justice
Pepper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with
	CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit CMU
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/1/99	IC (cont.)	requested to talk to someone in Administration as he said there is no such thing as a 60 day program. Ms. White was present at the time so she discussed the issue w/ Mikal. This counselor also encouraged Mikal to complete his Anger Control group w/ Mr. Holland & to remain offense free. Mikal was fairly pleasant today w/ the exception of a racial comment he made.	BF
3/99	TR/ CN	Received a phone call from Priscilla Budeiri of The Virginia Poverty Law Center. She stated, via message, that she would like to arrange a visit w/ Mikal. This Counselor consulted w/ Ms. Jones who advised that she will consult w/ Mr. Noble before this counselor	

FILE 5
 4300177

Department of Juvenile Justice
Pepper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mahdi Mikal
 Redacted
 DOB _____
 Living Unit CMU
 Assigned Counselor Amos

Date	Code	Entries	Initial
3/99	TR/ CN	returns Ms. Budeiri's call. _____ _____	BK
4/99	TU	This counselor returned Ms. Budeiri's call _____ and left a message advising that she may reach me at _____ or _____ Redacted. Also advised that she may also want to call Ms. White or Mr. Noble. _____	BK
5/99	TR	Received a call from Mr. Sherif Mahdi re: Mikal's status. Advised him that Mikal's behavior seems to have improved a little this week. Advised him that Mikal is still in the SOC (CMU) and not eligible for a visit until the 3rd Sunday of this month. Mr. Mahdi was pleasant on the phone today. _____	BK
5/99	IC	Met w/ Mikal for an individual	

RULE 5
DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received Telephone call made Weekly review Progress Review Group Counseling	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mahdi, Mikal</u> Redacted DOB _____ Living Unit <u>CMU</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
1/8/99	IC	session. informed him that this counselor spoke w/ his father. Advised Mikal, per his father's request, that his father loves him + misses him. Also, informed Mikal that this counselor observed him doing a good job in school. Explained to Mikal that it's important for him to maintain his behavior in order to progress in the Anger Control group. Mikal had no further questions or concerns for this counselor. —	BR
2/0/99	TR	Received phone call from Priscilla Budeiri. She informed this counselor (via message) that she planned to visit Mikal on Monday, November 15, 1999 at 10:30 a.m. This counselor informed Ms. Jones. Also advised Ms. White; she was	FILED 11-15-99 NOV 15 1999

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit CMU
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/10/99	TR	already aware of the planned visit. Ms. Budeiri will need access to Mikal's file as she is his "Attorney of Record."	FB
12/99	IC	Met w/ Mikal. He asked this counselor when he'll be eligible to move to General Population. Advised from CMU, he will go to the SOC. Advised Mikal that this counselor will bring him before treatment team ^{next} ~~thru~~ week. Commended Mikal for doing well in school. Encouraged him to comply w/ institutional rules so he can go home.	FB
1/6/99	IC	This counselor met w/ Mikal for an individual session & explained that he will be attending treatment team next week. Advised him that he needs to	

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received Telephone call made Weekly review Progress Review Group Counseling	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consulation with CRC	Name <u>Mahdi, Mikal</u> DOB <u>Redacted</u> Living Unit <u>CMU</u> Assigned Counselor <u>Amos</u>
--	--	---

Date	Code	Entries	Initial
11/16/99	IC	maintain his behavior; informed him that if he makes it to 11/27/99, he'll have been charge-free for four weeks. Mikal appeared to be a little upset but seemed to understand the importance of waiting one more week. In addition, CMU is a minimum of 30 days.	BA
7/99	TR	Received call from Mr. Mahdi who was calling re: Mikal's status. Advised Mr. Mahdi that Mikal has remained offense free since 10/30/99. Advised that he will be eligible for a review by the treatment team next week. Also advised that he is eligible for a visit this weekend as it is the 3 rd Sunday of the month. Also advised Mr. Mahdi that Mikal's in court today.	

**FILE 5
RECOVERY**

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received Telephone call made Weekly review Progress Review Group Counseling IC	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mahdi, Mikal</u> DOB <u>Redacted</u> Living Unit <u>CMU</u> Assigned Counselor <u>Amos</u>
--	---	---

Date	Code	Entries	Initial
1/17/99	TR	Mr. Mahdi aware of the Assault and Battery charge (Hanover) but he was unaware that he had court today. Mr. Mahdi thanked me for my time.	Bh
1/18/99	TR	Received message that Mr. Mahdi call & requested a return call.	Bh
1/19/99	TM	Called Mr. Mahdi Redacted & left a message to please call back.	Bh
	11-20-99	G.	
12/99	TT	Mikal was unable to attend treatment team as he was in the Special Housing Unit pending an Assault on Staff that occurred over the weekend. His paperwork will be forwarded to the IRC w/ the recommendation that Mikal remain in the CMU.	Bh
1/99	IRC	Mikal attended IRC - IRC	

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mahdi, Mikal
 Redacted
 DOB _____
 Living Unit CMU
 Assigned Counselor Amos

Date	Code	Entries	Initial
2/4/99	IRC	recommended that Cadet Mahdi remain in SOC - Conduct Management due to recent charges and continued non-compliance w/ the LEADER program.	BH
1/29/99	TR	Received message from Mr. Mahdi, who was calling for Mikal's status. He stated he would call back later.	BH
2/13/99	WR	This counselor met w/ Mikal on several occasions this week. He is currently in PC. Mikal advised this counselor that he would like to remain in PC for the remainder of his stay. Advised him that he did not have a problem w/ that but placement is a security issue, not for TX alone.	

**FILE 5
DISCOVERY**

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received Telephone call made Weekly review Progress Review Group Counseling C	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mahdi, Mikal</u> DOB <u>Redacted</u> Living Unit <u>PC</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
2/3/99	WR	to decide. Advised him that this counselor will have to run the idea by security - perhaps the Capt. or CDI Harris. Mikal understood.	BF
10/99	IC	This counselor met w/ Mikal in SHU for an individual session. We discussed his latest charge. He claims that Ofc. Waller spit on him & that's why he hit Ofc. Waller. This counselor also asked about what happened when he went to court. Mikal stated nothing - he has to go back on January 20. Also advised Mikal that his father called yesterday to check on his status. Mikal appeared to be in good spirits.	BF
1/99	TR	(late entry). Mr. Mahdi called	BF

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

R Telephone call received	TT Treatment Team Meeting
V Telephone call made	SP Service Plan Development
W Weekly review	CSUV Court Visit
R Progress Review	IC Individual Counseling
C Group Counseling	CN Consultation with
C	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit SHU
 Assigned Counselor Amos

Date	Code	Entries	Initial
7/9/99	TR	to check on Mikal's status. reformed Mr. Mahdi that Mikal placed in SHU for assaulting an officer. Advised him, however, that Mikal's offenses are fewer & further between.	BH
11/5/99	IC	This counselor met w/ Mikal for an individual session. He was busy reading; he had no questions or concerns for this counselor. This counselor encouraged him to remain offense-free.	BH
1/7/99	TR	Received a phone call from Mr. Sherif Mahdi. He left a message for me to return his call.	BH
1/7/99	TM	This counselor called Mr. Mahdi and left a	

RULE 5
DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

☑ Telephone call received	TT Treatment Team Meeting
☑ Telephone call made	SP Service Plan Development
✓ Weekly review	CSUV Court Visit
✓ Progress Review	IC Individual Counseling
✓ Group Counseling	CN Consultation with
✓ IC	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit SHU
 Assigned Counselor Amos

Date	Code	Entries	Initial
2/17/99	TM	message w/ the female who answered the phone. Informed her to please advise Mr. Mahdi that Mikal is eligible for a visit as it is the 3rd Sunday of the month.	BB
1/9/99	CN	This counselor met w/ Mr. Sherif Mahdi. We discussed Mikal's status. We also discussed the visitation procedures. He assured me he understood.	BB
2/1/99	TR/TM	Ms. White advised this counselor that Mikal's grandmother called. ^{Redacted} Returned her call as she had questions regarding Mikal's status and release date. Informed her that Mikal will be eligible for release when	

**FILE 5
DISCOVERY**

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

2 Telephone call received	TT-Treatment Team Meeting
1 Telephone call made	SP Service Plan Development
R Weekly review	CSUV Court Visit
2 Progress Review	IC Individual Counseling
2 Group Counseling	CN Consultation with
C	CRC

Name Mahdi, Mikal
 DOB Redacted
 Living Unit SHU
 Assigned Counselor Amos

Date	Code	Entries	Initial
12/1/99	TE/TM	he completes Anger Control treatment objective and when he remains major offense-free for a period of 90 days as well as moderate offense-free for a period of 30 days. Mrs. Bowell stated that she was informed that Mikal would be released in December. When this counselor asked her who advised her of that information, she stated that she did not have any names. This counselor informed her that Mikal received a major offense on 12/5/99 and a moderate offense on 12/8/99. Mrs. Bowell further stated that she doesn't appreciate him behaving "like that" and that she appreciates what this counselor	

**RULE 5
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

R Telephone call received	TT Treatment Team Meeting
M Telephone call made	SP Service Plan Development
VR Weekly review	CSUV Court Visit
PR Progress Review	IC Individual Counseling
IC Group Counseling	CN Consultation with
RC	CRC

Name Mahdi, Mikal
Redacted
DOB _____
Living Unit SHU
Assigned Counselor Amos

Date	Code	Entries	Initial
2/21/99	TR/TTM	is doing for him. Assured her that this counselor would like nothing better than to see him be able to maintain good behavior in order to be considered for release. Ms. Powell also asked if this counselor could relay a message to Mikal for her. Advised her yes.	Bh
12/23/99	TT	Mikal attended treatment team for a monthly progress review. Mikal continues to show inappropriate + non-compliant behavior. Also, he displays aggressive / assaultive behavior. Major + moderate offence pending. He refused to sign TT form. His case will be forwarded to the IRC.	Bh

**FILE 5
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received Telephone call made Weekly review Progress Review Group Counseling C	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consulation with CRC	Name <u>Mikal Mahdi</u> DOB <u>Redacted</u> Living Unit <u>CMU 150C</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
2/21/99	FC	(late entry) Met w/ Mikal for an individual session. He was very upset as he had a confrontation w/ staff. He refused to elaborate on the situation. Advised him of his grandmother's message. Informed him she loves him & is praying for him. Also advised him that she is planning to visit him 3rd Sunday in January, as this counselor explained visitation procedures to her. —	BR
30/99	TM	This counselor called Sherif Mahdi and informed him that Mikal is not eligible for visitation until the 3rd Sunday in January. Also informed him of Mikal's status - offense free since since December 8. —	BR

**RULE 3
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

TR Telephone call received	TT Treatment Team Meeting
TM Telephone call made	SP Service Plan Development
NR Weekly review	CSUV Court Visit
PR Progress Review	IC Individual Counseling
GC Group Counseling	CN Consultation with
RC	CRC

Name Mikal Mahdi
 DOB Redacted
 Living Unit SOC - Remedial
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/4/00	IRC	Mikal attended IRC. IRC recommended that he be taken out of the CMU and placed in the SOC-Remedial. Mikal was satisfied with IRC's decision as he did not wish to appeal. Mikal also informed the IRC that he would like his counselor changed. Ms. Whittaker agreed to discuss the issue w/ Mikal at a later time.	BH
1/5/00	IC	This counselor met w/ Mikal for an individual session. Informed him of his upcoming court date on January 20. Advised this may slow down release process. Mikal got upset - stated he did not want to talk about it.	BH

**RULE 5
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

TR Telephone call received TM Telephone call made NR Weekly review PR Progress Review GC Group Counseling RC	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC
---	---

Name Mikal Mahdi
 DOB Redacted
 Living Unit SOC - Remedial
 Assigned Counselor Amos

Date	Code	Entries	Initial
4/14/00	IC	met w/ Mikal for an individual session. Allowed him to make a phone call. Also gave him a letter that was addressed to him. Mikal was somewhat guarded and stated he did not feel like talking. Mikal has expressed a desire to have his counselor changed as he feels this counselor is trying to keep him here.	ph
4/19/00	TR	Received call from Mr. Sherif Mahdi. He left a message advising this counselor he will call back as he is "on the job." He was calling for Mikal's status.	ph
4/21/00	TM	Called Mr. Sherif Mahdi and left a message. Advised: female who answered the phone that	

**RULE 5
DISCOVERY**

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received Telephone call made Weekly review Progress Review Group Counseling	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mikal Mahdi</u> Redacted DOB _____ Living Unit <u>SOC - Remedial</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
4/00	TM	Mikal not eligible for a visit this weekend. Also advised her to please have Mrs. Mahdi call in order to discuss Mikal's status. Received call earlier today from Mrs. Mahdi - he stated via message that he was calling for Mikal's status.	BH
11/00	IC	This counselor met w/ Mikal for an individual session. He was unable to go to court this week due to inclement weather. Court date continued. Mikal appeared to be handling it well. He also admitted to "sounding like a broken record" and a "whiny-ass baby." This counselor commended Mikal as he has been displaying good behavior. We also discussed	

**RULE 6
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received	TT Treatment Team Meeting	Name	Mikal Mahdi
Telephone call made	SP Service Plan Development	DOB	Redacted
Weekly review	CSUV Court Visit	Living Unit	SOC - Remedial
Progress Review	IC Individual Counseling	Assigned Counselor	Ames
Group Counseling	CN Consultation with CRC		

Date	Code	Entries	Initial
21/00	IC	how he will handle more time. Mikal stated he thinks he will be able to handle it if he's in GP. Encouraged him to continue on the track he's on as he has remained offense-free since 12/21/99. Advised him he will be going before Treatment Team soon. Mikal informed this counselor to just "be straight" w/ him.	Pf
6/00	TT	Mikal was scheduled to attend Treatment Team today but his case was deferred until next week. Mikal eligible for a promotion to GP but he was involved in a fight last week w/ another cadet & he has pending charges which may effect his promotion.	Pf
3/00	TR	This counselor received a message from Sheriff Mahdi. He advised that	

HOLE 5
DISCOVERY :

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received Telephone call made Weekly review Progress Review Group Counseling	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mikal Mahdi</u> DOB <u>Redacted</u> Living Unit <u>SOC - Remedial</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
2/8/00	TR	counselor that he was unable to make it for visitation last week because he was having car trouble. He stated he cannot make it this weekend due to the weather. Mr. Mahdi called from work and stated he would call back for Mikal's status.	BA
3/00	IC	This counselor met w/ Mikal for an individual session. He requested this counselor follow-up for his court date. Mikal also stated he would like to call his P.O. Advised this counselor will set up a telephone conference. Mikal also asked to see Ms. Pearson & Ms. White. Mikal very upset & feels that "we" are trying to keep him here. Mikal accepts no responsibility for his actions.	BA

**RULE 5
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mikal Mahdi
 Redacted
 DOB _____
 Living Unit SOC - Remedial
 Assigned Counselor Amos

Date	Code	Entries	Initial
1/1/00	TT	Mikal was scheduled to attend treatment team but was unable to attend as he was displaying aggressive & threatening behavior. In addition, he was writing obscenities on his cell wall w/ pudding. Mikal received a major on 1/21/00 and a moderate on 1/26/00. In order for him to be eligible for placement in GP, he must remain ^{major} offense-free until 2/21/00. He can receive no more than one moderate. This case will be forwarded to the IRC for an evaluation.	
1/00	TR	This counselor received a phone call from Mikal's father, Sherif Mahdi. He was calling for Mikal's status. Informed him of the above. Also informed him that Mikal didn't go to court on 1/20/00 as scheduled.	Ph

RULE 5

DISCOVERY

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mikal Mahdi
Redacted
DOB _____
Living Unit SOC - Remedial
Assigned Counselor Amor

**RULE 5
DISCOVERY**

Date	Code	Entries	Initial
1/1/00	TR	due to inclement weather. Advised him the court date has been re-scheduled for the latter part of February. Further, advised Mr. Mahdi that Mikal is not eligible for a visit until the 3rd Sunday in February, 2/20/00. _____	PB
3/00	IRC	Mikal attended the IRC meeting. The IRC recommended that he remain in SOC-Remedial in spite of his recent charges & overall behavior. Mikal refused to sign the IRC form. _____	PB
4/00	IC	Met w/ Mikal. We discussed what happened at the IRC. He stated he understood why he was kept in SOC-Remedial. Encouraged Mikal to remain offense-free - advised him he was so close to population. Also advised Mikal that he will get	

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mikal Mahdi
 Redacted
 DOB _____
 Living Unit 506-Remedial
 Assigned Counselor Amos

Date	Code	Entries	Initial
4/00	IC	him copies of the material he requested provided there are copies in his file. Also advised Mikal that we will sit down w/Ms. Gates & discuss his situation. This counselor is concerned about Mikal as he doesn't appear to accept any responsibility for his own actions & this is hurting him. Mikal also appears to be bitter & resentful & this is eating at him in my opinion.	JK
	2-44	005	
1/00	IC/ CSUV/ TM	(late entry) Met w/ Mikal along w/ his P.O., Ms. Jaison. We discussed his progress as well as his pending charge for which he will appear in court on 2/24/00 at 11:00 AM. Mikal also requested a phone call. Allowed him to make a phone call but he	

RULE 5
DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

R Telephone call received M Telephone call made JR Weekly review R Progress Review C Group Counseling IC	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consulation with CRC
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Name Mikal Mahdi
 DOB Redacted
 Living Unit SOC - Remedial
 Assigned Counselor Amos

Date	Code	Entries	Initial
2/9/00	IC/	did not get through. _____	
	CSUV/	_____	
	TM	_____	PS
2/15/00	IC	Met w/ Mikal for an individual counseling session. He requested copies of all "papers" regarding (pertaining to) his upcoming court date. He is scheduled to appear in court on 2/24/00 at 11:00 a.m. Mikal also requested a phone call. Mikal also asked this counselor what would likely happen in court. Advised him it is hard to predict what will happen in court but encouraged him to think positive.	PS
1/17/00	WR	Mikal will attend Treatment Team next week as he is eligible for a promotion to Cadet 1st Class. Treatment Team will likely make the recommendation that Mikal be	

FILED
 DISCOVER

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

Telephone call received Telephone call made Weekly review Progress Review Group Counseling	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mikal Mahdi</u> DOB <u>Redacted</u> Living Unit <u>SOC - Remedial</u> Assigned Counselor <u>Ames</u>
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Date	Code	Entries	Initial
1/7/00	UR	promoted. This case will be forwarded to the IRC for final approval.	PG
1/7/00	TR	Received call from Nancy Powell.	PG
2/1/00	TR	Returned Mrs. Powell's call	Redacted
		Redacted - No answer, No machine.	
		Will make another attempt to reach Mrs. Powell at a later time.	PG
3/1/00	TT	Mikal attended treatment team. His behavior has improved tremendously. Treatment team recommended he be promoted to Cadet 1st Class & placed in general population. This case will be forwarded to the IRC.	PG
11/1/00	O	Mikal in court today.	PG
3/1/00	IC	Attempted to meet w/ Mikal for an individual session. He stated he does not feel like talking to anybody. He appears to be upset about court yesterday. This counselor	

DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with CRC

Name Mikal Mahdi
Redacted
DOB _____
Living Unit SDC - Remedial
Assigned Counselor Amos

Date	Code	Entries	Initial
15/00	IC	will follow-up for details.	BA
25/00	IRC	Mikal attended IRC today. The IRC approved Mikal for Cadet 1st Class + placement in general population.	BA
1/00	IC	Individual session w/ Mikal. He informed this counselor he was re-committed to the DJJ when he went to court. Advised him RDC will calculate his LOS + this counselor will follow-up w/ RDC. He appeared to be frustrated but handled himself appropriately. He appears to be somewhat more "at ease" in general population.	BA
1/00	IC	Brief contact w/ Mikal. Asked him if he wanted to make a phone call. He stated "no" because "it is too expensive."	BA
1/00	IC	Individual session w/ Mikal in the SHU. He is serving a 90-day	

FILE 5
DISCOVERY

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consultation with
	CRC

Name Mikal Mahdi
 Redacted
 DOB _____
 Living Unit SOC - Remedial
 Assigned Counselor Amos

Date	Code	Entries	Initial
10/00	IC	for receiving a charge. Mikal not sure as to what kind of charge he received. Advised Mikal that if he received a major, he would go back to the SOC. Mikal became very upset & began yelling. He is very argumentative. Stated staff is trying to run him up. Advised Mikal this counselor will look into his charge. End of conversation.	PS
	3-11-06	0600	
11/00	IC / TR	Individual session with Mikal. He was in the Special Housing Unit on PC. He apparently requested to move to PC. Discussed his recent major charge. Advised him it will more than likely, effect his status. Advised IRC will hear his case today. Also informed	

**RULE 5
DISCOVERY**

**Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record**

R Telephone call received M Telephone call made W Weekly review R Progress Review C Group Counseling C	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC	Name <u>Mikal Mahdi</u> Redacted DOB _____ Living Unit <u>4-D / PC</u> Assigned Counselor <u>Amos</u>
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Date	Code	Entries	Initial
16/00	IC/ TR	Mikal that cl rec'd a call from his father this week. Informed him his father will be coming for visitation this weekend. Advised Mikal that overall, cl am pleased w/ his progress but also advised cl must adhere to program & w/ one major, he will receive a reduction in rank & go back to SOC. Further, advised Mikal that Ms. Jones has called RDC trying to get information on his new LOS. Mikal understood. —	BB
7/00	TM	Ms. Jones called RDC, this the second time, trying to secure Mikal's new LOS as he was recommitted to DJJ in February.	BB
16/00	IRC	(late entry) Mikal demoted to SOC.	BB

**RULE 5
DISCOVERY**

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

R Telephone call received	TT Treatment Team Meeting
M Telephone call made	SP Service Plan Development
VR Weekly review	CSUV Court Visit
R Progress Review	IC Individual Counseling
IC Group Counseling	CN Consultation with
RC	CRC

Name Mikal Mahdi
 Redacted
 DOB _____
 Living Unit 4-D / PC
 Assigned Counselor Amos

Date	Code	Entries	Initial
3/13/00	TR	(late entry) Mr. Shereef Mahdi called this counselor regarding Mikal's status. Informed Mr. Mahdi that Mikal's behavior has improved tremendously. Also informed Mr. Mahdi that Mikal is now in general population & eligible for a visit each Sunday as long as he maintains his behavior. Mr. Mahdi thanked this counselor. — <i>PM</i>	
1/5/00	Tm	This counselor called Mikal's father, Shereef Mahdi, as he just received word that Mikal is to go to IRC for demotion to SOC. Mikal received a major charge. Mr. Mahdi appeared to be upset. This counselor also reminded him that Mikal will only be eligible for visit the 3 rd Sunday	

of the month until he gets out of the SOC. *(PM)*

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

R Telephone call received
M Telephone call made
VR Weekly review
PR Progress Review
GC Group Counseling
RC

TT Treatment Team Meeting
SP Service Plan Development
CSUV Court Visit
IC Individual Counseling
CN Consultation with
CRC

Name Mikal Mahdi
DOB Redacted
Living Unit 4-D/PC
Assigned Counselor Amos

Date	Code	Entries	Initial
3/21/00	TM	Ms. Jones called RDC and spoke with Livia Ganson in an attempt to secure Mikal's new LOS. —————	PS
3/21/00	TT	Mikal attended treatment team for a monthly progress review. His behavior has been inconsistent. He was recently demoted to SOC on 3/16/00. Provided he remains offense-free, he will be eligible for a promotion to 1st Class on 4/16/00. —————	PS
12/1/00	IC	Explained to Mikal that we are trying to secure his new LOS. Mikal has been fairly patient concerning this matter. Acknowledged his frustration and advised we will inform him of his new LOS as soon as we find out. Mikal was re-committed to DJJ on 2/24/00. —————	PS
12/6/00	O	Mr. Mahdi showed for visitation. Informed Mr. Mahdi that.	

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

R Telephone call received M Telephone call made VR Weekly review PR Progress Review GC Group Counseling RC	TT Treatment Team Meeting SP Service Plan Development CSUV Court Visit IC Individual Counseling CN Consultation with CRC
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Name Mikal Mahdi
 Redacted
 DOB _____
 Living Unit 4-D/PC
 Assigned Counselor Amos

Date	Code	Entries	Initial
3/26/00	D	Mikal is in SOC & not eligible for a visit. Mr. Mahdi stated he knew Mikal was in SOC, but he thought "he'd give it a try". Ms. Carpenter witnessed our conversation as did Officers Waller & Davis. Officer Waller called Capt. Rivera. This counselor also spoke with Capt. Rivera. He permitted Mr. Mahdi to visit. —	RB
3-31-00	TM	Telephoned Mr. Mahdi at 804-272-2624 and told him Mikal would not be able to have a visit as he is in SOC	RB
3/00	TR	Received call from Sherief Mahdi. He wanted to know Mikal's new LOS. —	RB
3/00	TM	Returned Mr. Mahdi's call & left a message to please call back. —	RB

Running Case Record

Telephone call received	TT Treatment Team Meeting
Telephone call made	SP Service Plan Development
Weekly review	CSUV Court Visit
Progress Review	IC Individual Counseling
Group Counseling	CN Consulation with
C	CRC

Name Mikal Mahdi
Redacted
DOB _____
Living Unit PC (SOC)
Assigned Counselor Amos

Date	Code	Entries	Initial
4/5/00	IC	Individual session with Mikal in PC. Informed him of his new LOS (9-15 mos.) which began at his last ELOS. Explained he would have been eligible for release 4/22/00 but he received a major on 3/4/00. Advised him, however, instead of 90 days, we are only going to ask that he remain major offense-free for 60 days which makes him eligible for release on 5/4/00. Mikal remained calm; stated he did not want to get too excited. He requested a copy of the fax that Ms. Jones received from Ms. Jansen. This CRC stressed the importance of positive behavior.	PS

FILED
2000 MAY 10

Department of Juvenile Justice
Culpeper Juvenile Correctional Center

COPY TO MASTER

Running Case Record

TR Telephone call received	TT Treatment Team Meeting
TM Telephone call made	SP Service Plan Development
WR Weekly review	CSUV Court Visit
PR Progress Review	IC Individual Counseling
GC Group Counseling	CN Consultation with
IRC	CRC

Name Mikal Mahdi
Redacted
DOB _____
Living Unit PC (SOC.)
Assigned Counselor Amos

Date	Code	Entries	Initial
4/6/00	TM	This CRC called Sherief Mahdi at Redacted and left a message to please call back. Need to inform him of Mikal's release date.	PS
4/6/00	IC	Brief contact with Mikal. I gave him a copy of the fax he requested.	PS
	4-8-00	for	
4/11/00	TM	This counselor called P.O. Clara Gaison 348-3645 and left a message with her secretary. Inform her Mikal eligible for release on 5/4/00 and to please have Mrs. Gaison call back.	PS
4/17/00	O	Mailed letter to P.O. Clara Gaison announcing Mikal eligible for release on 5/4/00; requested she forward parole rules & her letter of parole acceptance.	PS
7/00	TM	Called P.O. Clara Gaison & left a	

**RULE
DISCOVER**

Department of Juvenile Justice
Culpeper Juvenile Correctional Center
Running Case Record

TR Telephone call received	TT Treatment Team Meeting
TM Telephone call made	SP Service Plan Development
NR Weekly review	CSUV Court Visit
PR Progress Review	IC Individual Counseling
GC Group Counseling	CN Consultation with
RC	CRC

Name Mikal Mahdi
 Redacted
 DOB _____
 Living Unit PC
 Assigned Counselor Ames

Date	Code	Entries	Initial
4/25/00	TT	Mikal attended treatment team as he is eligible for a promotion to Cadet 1st Class. He is also scheduled for release on 5/4/00. His case will be forwarded to IRC regarding both issues. —	PB
5/25/00	TR / TM	Received a call from P.O. Clara Jaison after this counselor called. * left another message. Ms. Jaison advised this counselor that she is in the process of working on Mikal's parole rules & securing placement. She advised that Mikal will return home to live with his grandmother as she has received no responses from his father. —	PB
5/27/00	IRC	Mikal did not attend IRC; IRC reviewed his case however & decided he will remain in PC until his scheduled release date of 5/4/00 (PB)	

**RULE 3
DISCOVERY**

EXHIBIT "C"

KOGER LAW FIRM, P.A.
Joshua Koger, Jr.

Attorney and Counselor at Law

616A West Main Street
Post Office Box 40
North, South Carolina 29112
(803) 247-6250

Billing Statement for the State of South Carolina vs. Mikal Deen
Mahdi

<u>Date</u>	<u>Activity</u>	<u>Time (Hrs.)</u>
7/07/06	Travel to St. Matthews from Columbia for hearing	.75
7/07/06	Appointment as co-counsel at hearing	.75
7/07/06	Travel to North, S.C. from St. Matthews	.5
7/11/06	Retrieval and initial review of file	6.0
7/15/06	Travel to Orangeburg from Columbia to meet with Glenn Walters	1.0
7/15/06	Meeting and consultation with Glenn Walters	2.0
7/15/06	Travel to Columbia (home) from Orangeburg	1.0
7/18/06	Review of file	4.0
7/20/06	Review of file	4.0
7/21/06	Travel to Kirkland Correctional Institution (Cola.) from home to meet with M. Mahdi	.5
7/21/06	Meeting with M. Mahdi	2.0
7/21/06	Travel to North from Kirkland	1.0

**DEFENDANT'S
EXHIBIT**

39-11 20 04-164
LD

7/22/06	Review of file	4.0
7/25/06	Review of file	4.0
7/29/06	Review of file	4.0
8/07/06	Travel to the Law Firm of Carl B. Grant for Death Team Expert Meeting	.25
8/07/06	Preparation for Death Team Expert Meeting	3.0
8/07/06	Death Team Expert Meeting	2.0
8/07/06	Travel to home from the Law Firm of Carl B. Grant	.25
8/09/06	Review of file	4.0
8/12/06	Review of file	4.0
8/14/06	Review of file	4.0
8/17/06	Review of file	4.0
8/18/06	Travel to Orangeburg from North to meet with Glenn Walters	.5
8/18/06	Review and proofread motions with Glenn Walters	6.0
8/18/06	Travel to Columbia (home) from Orangeburg	1.0
8/19/06	Review of file	4.0
8/22/06	Travel to Orangeburg from North to meet with Glenn Walters	.5
8/22/06	Review and final proofread of motions with Glenn Walters	4.5

8/23/06	Travel to Kirkland Correctional Institution	
	from home	.5
8/23/06	Meeting with M. Mahdi	2.0
8/23/06	Travel to North from Kirkland	1.0
8/26/06	Review of file	4.0
8/30/06	Pretrial motions hearing	4.0
9/02/06	Review of file	4.0
9/06/06	Travel to Kirkland from home	.5
9/06/06	Meeting with M. Mahdi	2.0
9/09/06	Review of file	4.0
9/14/06	Review of file	4.0
9/15/06	Travel to library (Cola.) to review file	.25
9/15/06	Review of file	4.0 ✓
9/15/06	Travel to Kirkland from library	.5
9/15/06	Meeting with M. Mahdi	1.5
9/18/06	Review of file	4.0 ✓
9/20/06	Review of file	4.0 ✓
9/22/06	Review of file	4.0 ✓
9/25/06	Review of file	4.0 ✓
9/27/06	Review of file	4.0 ✓
9/30/06	Review of file	4.0 ✓
10/02/06	Review of file	4.0 ✓
10/04/06	Review of file	4.0 ✓

10/06/06	Travel to Lawrenceville, Va. From Cola.	6.0
	to meet with Nancy Burwell	
10/06/06	Meeting with Nancy Burwell	1.0
10/06/06	Travel to Cola. from Lawrenceville, Va.	6.0
10/09/06	Review of file	4.0
10/12/06	Review of file	4.0
10/14/06	Review of file	4.0
10/17/06	Review of file	4.0
10/19/06	Review of file	4.0
10/20/06	Review of file	4.0
10/21/06	Review of file	4.0
10/24/06	Travel to Kirkland from home	.5
10/24/06	Meeting with M. Mahdi	2.0
10/24/06	Travel to office of Jeff Bloom for meeting	.25
	from Kirkland	
10/24/06	Consultation and meeting with Jeff Bloom	2.0
10/24/06	Travel to North from Jeff Bloom (Cola.)	1.0
10/25/06	Review of file	4.0
10/27/06	Travel from Cola. to St. Matthews for hearing	.75
10/27/06	Judge's meeting (already in progress)	1.0
10/27/06	Review of file	4.0
10/29/06	Travel to Orangeburg from home to meet	1.0
	with Glenn Walters	

10/29/06	Meeting and consultation with Glenn Walters	4.0
10/29/06	Travel to home from Orangeburg	1.0
10/30/06	Travel to SLED from home	.5
10/30/06	Review of SLED evidence at headquarters	3.0
10/30/06	Travel to North from SLED	1.0
10/30/06	Review of file	4.0
11/02/06	Travel to Kirkland from home to meet with M. Mahdi	.5
11/02/06	Meeting with M. Mahdi	2.0
11/02/06	Travel to Orangeburg from Kirkland to meet with Glenn Walters	1.0
11/02/06	Meeting and consultation with Glenn Walters	~~3.0~~ (2.0)
11/02/06	Travel to home from Orangeburg	1.0
11/02/06	Review of file	4.0
11/03/06	Review of file	8.0
11/04/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/04/06	Meeting and consultation with Glenn Walters	8.0
11/04/06	Travel to home from Orangeburg	1.0
11/05/06	Review of file	8.0
11/06/06	Review of file	8.0
11/07/06	Travel to Kirkland from home	.5

11/07/06	Meeting with M. Mahdi	2.0
11/07/06	Travel to North from Kirkland	1.0
11/07/06	Review of file	6.0
11/08/06	Review of file	8.0
11/09/06	Travel to Kirkland from home	.5
11/09/06	Meeting with M. Mahdi	2.0
11/09/06	Travel to North from Kirkland	1.0
11/09/06	Review of file	6.0
11/10/06	Review of file	8.0
11/11/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/11/06	Meeting and consultation with Glenn Walters	8.0
11/12/06	Review of file	8.0
11/13/06	Review of file	8.0
11/14/06	Travel to Death Team Expert Meeting from home at the Law Firm of Carl B. Grant	.25
11/14/06	Death Team Expert Meeting	2.0
11/14/06	Review of file	6.0
11/15/06	Travel to Kirkland from home	.5
11/15/06	Meeting with M. Mahdi	2.0
11/15/06	Travel to North from Kirkland	1.0
11/15/06	Travel to Orangeburg from North to meet with Glenn Walters	.5

11/15/06	Meeting and consultation with Glenn Walters	5.0
11/15/06	Travel to home from Orangeburg	1.0
11/16/06	Review of file	6.0
11/16/06	Travel to Orangeburg from North to meet with Glenn Walters	1.0
11/16/06	Meeting and consultation with Glenn Walters	2.0
11/16/06	Travel to home from Orangeburg	1.0
11/17/06	Travel to Jury Consultation seminar from home	.25
11/17/06	Attendance at Jury Consultation seminar of Jeff Bloom	7.0
11/17/06	Review of file	2.0
11/18/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/18/06	Meeting and consultation with Glenn Walters	8.0
11/18/06	Travel to home from Orangeburg	1.0
11/19/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/19/06	Meeting and consultation with Glenn Walters	8.0
11/19/06	Travel to home from Orangeburg	1.0
11/20/06	Travel to St. Matthews from Columbia for hearing	.75
11/20/06	<u>Blair</u> and <u>Lyle</u> hearing and other pretrial matters	3.0

11/20/06	Travel to Orangeburg from St. Matthews to meet with Glenn Walters	.25
11/20/06	Meeting and consultation with Glenn Walters	4.0
11/20/06	Review of file	2.0
11/20/06	Travel to home from Orangeburg	1.0
11/21/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/21/06	Meeting and consultation with Glenn Walters	10.0
11/21/06	Travel to home from Orangeburg to meet with Glenn Walters	1.0
11/22/06	Meeting and consultation with Glenn Walters	6.0
11/22/06	Travel to Columbia from Orangeburg to deliver juror information to Dr. Smith	1.0
11/22/06	Travel to home from residence of Dr. Smith	.5
11/24/06	Review of file	8.0
11/25/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/25/06	Meeting and consultation with Glenn Walters	10.0
11/25/06	Travel to home from Orangeburg	1.0
11/26/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
11/26/06	Meeting and consultation with Glenn Walters	12.0
11/26/06	Travel to home from Orangeburg	1.0

11/27/07	Travel to St. Matthews from home for trial	.75
11/27/06	Trial begins (Jury Qualification)	14.0
11/27/06	Travel to home from St. Matthews	.75
11/28/06	Travel to St. Matthews from home for trial	.75
11/28/06	Trial (Jury Qualification)	14.0
11/28/06	Travel to home from St. Matthews	.75
11/29/06	Travel to St. Matthews from home for trial	.75
11/29/06	Trial (Jury Qualification)	18.0
11/29/06	Travel to home from St. Matthews	.75
11/30/06	Travel to St. Matthews from home for trial	.75
11/30/06	Trial (Pled Guilty)	10.0
11/30/06	Travel to home from St. Matthews	.75
12/01/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
12/01/06	Meeting and consultation with Glenn Walters (Preparation for sentencing phase)	10.0
12/01/06	Travel to home from Orangeburg	1.0
12/02/06	Review of sentencing materials	10.0
12/03/06	Travel to Orangeburg from home to meet with Glenn Walters	1.0
12/03/06	Meeting and consultation with Glenn Walters	10.0
12/03/06	Travel to home from Orangeburg	1.0

12/04/06	Travel to St. Matthews from home for sentencing trial	.75
12/04/06	Sentencing Trial	8.0
12/04/06	Travel to home from St. Matthews	.75
12/05/06	Travel to St. Matthews from home for sentencing trial	.75
12/05/06	Sentencing Trial	8.0
12/05/06	Travel to home from St. Matthews	.75
12/06/06	Travel to St. Matthews from home for sentencing trial	.75
12/06/06	Sentencing Trial	8.0
12/06/06	Travel to home from St. Matthews	.75
12/07/06	Preparation of memorandum	4.0
12/08/06	Travel to St. Matthews from home for pronouncement of sentence	.75
12/08/06	Pronouncement of sentence	2.0
12/08/06	Travel to home from St. Matthews	<u>.75</u>
	Total No. of Hours	568.25
	Hourly Rate (\$125.00)	x <u>125</u>
	Total Billing	\$71,031.25