

THE UNITED STATES ARMY  
COURT OF CRIMINAL APPEALS

UNITED STATES,

Appellee

v.

APPELLANT'S MOTION TO ATTACH  
DEFENSE APPELLATE EXHIBITS  
O - R

Docket No. ARMY 20130679

First Lieutenant  
CLINT A. LORANCE,  
United States Army,  
Appellant

Tried at Fort Bragg, North Carolina, on  
25 April, 22 July, 30 July, 31 July, and  
1 August 2013 before a general court-  
martial appointed by the Commanding  
General, Headquarters, 82<sup>nd</sup> Airborne  
Division, Fort Bragg, North Carolina,  
Colonel Kristen Brunsen, military judge,  
presiding.

TO THE HONORABLE, THE JUDGES OF THE UNITED STATES  
ARMY COURT OF CRIMINAL APPEALS

COME NOW the undersigned appellate defense counsel pursuant to Rule  
23(b) of this Honorable Court's Rules of Practice and Procedure, and move to  
attach Defense Appellate Exhibits O through R filed contemporaneously  
herewith.

Defense Appellate Exhibit O is First Lieutenant (1LT) Lorance's  
declaration made under penalty of perjury in support of his Assignments of Error  
generally and specifically, his claim of ineffective assistance of counsel. This  
evidence is relevant and necessary for this Court to fully evaluate civilian  
defense's counsel's performance and whether it fell below the standard of care  
required of the complexities in this court-martial.

Defense Appellate Exhibit P is the entirety of the contents of civilian defense counsel's file. Its contents are relevant and necessary for this Court to assess whether or not counsel's preparation and communication were sufficient in light of the complexities in this court-martial.

Defense Appellate Exhibit Q is the redacted Army Regulation (AR) 15-6 Findings and Recommendations made as part of the pretrial investigation into the facts and circumstances surrounding 1LT Lorange's conduct on 2 July 2012 in the Zharay District of Afghanistan. First Lieutenant Lorange cites this report in his Assignments of Error as bearing on the question of whether or not findings and sentence are correct in law and fact.

Defense Appellate Exhibit R is a representative slide of an actual case prosecuted at the Justice Center in Parwan, Afghanistan. The slide is relevant and necessary to demonstrate how prevalent the Army's use of biometric evidence is in Afghanistan.

WHEREFORE, appellate defense counsel respectfully requests this Court grant appellant's motion.

PANEL NO. 3

MOTION TO ATTACH  
DEF APP EXS O - R

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GRANTED: \_\_\_\_\_  
DENIED: \_\_\_\_\_  
DATE: \_\_\_\_\_

SCOTT MARTIN  
CPT, JA  
Appellate Defense Counsel