



2011

Recent Developments: Cuffley v. State:  
Ambiguities Arising from the Interpretation of the  
Sentencing Terms of a Plea Agreement Must Be  
Resolved Solely Based on the Trial Court Record,  
with No Reference to Extrinsic Evidence, under  
Maryland Rule 4-243

J. Burke Miller

Follow this and additional works at: <http://scholarworks.law.ubalt.edu/lf>

 Part of the [Law Commons](#)

Recommended Citation

Miller, J. Burke (2011) "Recent Developments: Cuffley v. State: Ambiguities Arising from the Interpretation of the Sentencing Terms of a Plea Agreement Must Be Resolved Solely Based on the Trial Court Record, with No Reference to Extrinsic Evidence, under Maryland Rule 4-243," *University of Baltimore Law Forum*: Vol. 41 : No. 2 , Article 7.

Available at: <http://scholarworks.law.ubalt.edu/lf/vol41/iss2/7>

This Article is brought to you for free and open access by ScholarWorks@University of Baltimore School of Law. It has been accepted for inclusion in University of Baltimore Law Forum by an authorized editor of ScholarWorks@University of Baltimore School of Law. For more information, please contact [snolan@ubalt.edu](mailto:snolan@ubalt.edu).

## RECENT DEVELOPMENT

---

### *CUFFLEY V. STATE*

By: J. Burke Miller

**AMBIGUITIES ARISING FROM THE INTERPRETATION OF THE SENTENCING TERMS OF A PLEA AGREEMENT MUST BE RESOLVED SOLELY BASED ON THE TRIAL COURT RECORD, WITH NO REFERENCE TO EXTRINSIC EVIDENCE, UNDER MARYLAND RULE 4-243.**

All Recent Developments are available on the *University of Baltimore Law Forum* website: <http://law.ubalt.edu/lawforum>.

Please cite this Recent Development as *Cuffley v. State*, 41 U. Balt. L.F. 174 (2011).