Recent Developments: Garner v. State: An out-of-Court Statement Made by an Unknown Caller to the Defendant's Cell Phone While in Police Custody Did Not Constitue Inadmissible Hearsay; Where Defendant Never Discharged His Counsel, Md. Rule 4-215(a)(3) Did Not Apply

Mary Lynn Denholm
RECENT DEVELOPMENT

GARNER V. STATE

By: Mary Lynn Denholm

AN OUT-OF-COURT STATEMENT MADE BY AN UNKNOWN CALLER TO THE DEFENDANT’S CELL PHONE WHILE IN POLICE CUSTODY DID NOT CONSTITUTE INADMISSIBLE HEARSAY; WHERE DEFENDANT NEVER DISCHARGED HIS COUNSEL, MD. RULE 4-215(a)(3) DID NOT APPLY.

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Please cite this Recent Development as Garner v. State, 41 U. Balt. L.F. 92 (2010).