

IN THE DISTRICT COURT FOR BALTIMORE CITY, MARYLAND

JAMES T. KIRK

*Plaintiff*

*v.*

QO'NOS HIGH COMMAND, INC.

*Defendant*

Case No. 0101-0000000-2018

Trial Date: April 4, 2018, 8:30 a.m.

**REQUEST FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM**

COMES NOW Plaintiff James T. Kirk, through counsel and request that this Court issue a Writ of Habeas Corpus *Ad Testificandum*. The grounds for this request are as follows:

1. Trial in this matter is set for April 4, 2018 at 8:30 a.m. The location of the trial is the District Court for Baltimore City, at 501 E. Fayette Street, Baltimore, Maryland 21202. The docket currently lists this case as set for Hearing Room 7.
2. An independent witness, Tolian Soran (DOB: 01/01/1978, ID No. 170118), is currently incarcerated in the Maryland Correctional Institution—Hagerstown, located at 18601 Roxbury Road, Hagerstown, Maryland 21746.
3. The testimony and presence of Tolian Soran is essential to the presentation of Plaintiff's case.

**WHEREFORE**, Plaintiff requests that this Court:

- A. Issue a Writ of Habeas Corpus *Ad Testificandum* directed to the Warden of the Maryland Correctional Institution—Hagerstown to produce Tolian Soran on April 4, 2018 at 8:30 a.m., at the District Court for Baltimore City, 501 E. Fayette Street, Baltimore, Maryland 21202, so that he might testify in the above-captioned case; and

B. Grant such other and further relief as the nature of his cause requires.

Respectfully submitted,

**POSNER & CORD, LLC**

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*Counsel for Plaintiff*

**RULE 20-201 CERTIFICATE**

I certify that this filing does not contain any restricted information.

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John J. Cord

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of January, 2018, a copy of the foregoing Writ of Habeas Corpus *Ad Testificandum* was sent via first-class mail to the following counsel:

J. Worf, Esquire  
1701 N. Charles Street  
100 North Holliday Street  
Baltimore, Maryland 21202  
*Counsel for Defendant Qo'NoS  
High Command, Inc.*

Warden  
Maryland Correctional Institution – Hagerstown  
18601 Roxbury Road  
Hagerstown, Maryland 21746

**Posner & Cord, LLC**  
108 W. Timonium Road  
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Timonium, MD 21093  
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John J. Cord

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WRIT OF HABEAS CORPUS AD TESTIFICANDUM

THE STATE OF MARYLAND

To: Warden  
Maryland Correctional Institution – Hagerstown  
18601 Roxbury Road  
Hagerstown, Maryland 21746

You are hereby commanded to have the body of Tolian Soran, ID No.170118, who is detained under your custody as it is said, under a safe and secure conduct before the District Court for Baltimore City, 501 E. Fayette Street, Baltimore, Maryland 21202, on **April 4, 2018 at 8:30 a.m.** until trial has been completed, to testify at trial, and after completion of that case, to return the prisoner to the institution.

WITNESS the hand of the Judge of the District Court for Baltimore City this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Judge  
District Court for Baltimore City