



2010

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 Constitute Inadmissible Hearsay; Where Defendant Never Discharged His Counsel, Md. Rule 4-215(a)(3) Did Not Apply

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Recommended Citation

Denholm, Mary Lynn (2010) "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 Constitute Inadmissible Hearsay; Where Defendant Never Discharged His Counsel, Md. Rule 4-215(a)(3) Did Not Apply," *University of Baltimore Law Forum*: Vol. 41 : No. 1 , Article 9.

Available at: <http://scholarworks.law.ubalt.edu/lf/vol41/iss1/9>

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## RECENT DEVELOPMENT

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### *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).