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COMMONWEALTH OF MASSACHUSETTS

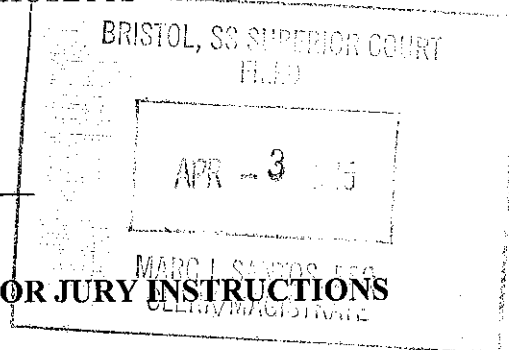
BRISTOL, ss.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CRIMINAL #2013-983

COMMONWEALTH OF MASSACHUSETTS

v.

AARON HERNANDEZ



DEFENDANT'S FIRST SUPPLEMENTAL REQUEST FOR JURY INSTRUCTIONS

Aaron Hernandez, defendant in the above-captioned criminal case, hereby moves this Court, pursuant to Mass. R. Crim. P. 24(b), the Fifth and Fourteenth Amendments to the United States Constitution, and Article 12 of the Massachusetts Declaration of Rights to include the following instruction in its charge to the jury. As grounds therefore, defendant avers that in a case based almost entirely upon circumstantial evidence, this instruction is necessary to protect him from being convicted based upon speculation and conjecture.

Respectfully submitted,

AARON HERNANDEZ

By his attorneys,

Michael K. Fee (ps)

Michael K. Fee, BBO #544541
Latham & Watkins, LLP
John Hancock Tower
200 Clarendon Street, 20th Floor
Boston, MA 02116
(617) 948-6000

James L. Sultan

James L. Sultan, BBO #488400
Charles W. Rankin, BBO #411780
Rankin & Sultan
151 Merrimac Street, Second Floor
Boston, MA 02114
(617) 720-0011