

THOMAS F. HALLETT LAW OFFICES, P.A.

36 Union Wharf
P.O. Box 7508
Portland, Maine 04112

THOMAS F. HALLETT
TELEPHONE
Admitted in ME and MA

(207) 775-4255
TELECOPIER
(207) 775-4229

e-mail:

Tfhallett@aol.com

August 5, 2002

James Chute
Clerk of the Law
P.O. Box 368
Portland, Maine 04112

RE: State of Maine v. Michael Doyle
Law Docket No. CUM-02-175

Dear Mr. Chute:

It recently came to our attention that there was a formatting mistake in one of the paragraphs to our reply brief for the appellant Michael Doyle. Page 6 in the first full paragraph should read as follows:

The second inquiry regards the Appellant's own subjective belief as to whether he had counsel who was ready to go forward with trial. Any reasonable person standing in a defendant's shoes would want to know whether or not he is going to trial with a lawyer prepared to defend him. Attorney Van Dyke can claim that he was fully prepared for trial, but objectively he was not. We will not go through the laundry list of items Attorney Van Dyke had not prepared as we did in our brief, but suffice it to say that Attorney Van Dyke had not done the most basic things he needed to do to prepare for trial. Doyle could see that Van Dyke was simply not prepared. That unpreparedness and inability to go forward and try the case forced Doyle into a position where he had to plea to guilty. As a result, Doyle's pleas were not voluntary, and the Rule 11 proceedings were deficient.

James Chute

10/27/02

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Please bring this correction to the attention of the Justices. Thank you for your attention to this matter.

Very truly yours,

Timothy E. Zerillo

TEZ/caf

cc: Michael Doyle
Amy M. Homans, Esq.
Michael Collaran, Esq.