

**DISCOVERY OF MURDER VICTIM'S MEDICAL RECORDS –
CERTIFICATION OF VICTIM'S SURVIVOR OPPOSING DISCOVERY**

CAPTION

I, **D. L.**, hereby certify as follows:

1. I am the younger son of Marjorie Land. I strongly oppose James Wilson's request for access to my mother's records.
2. My mother was 87 years old at the time of her death. She was very physically active and took complete care of herself.
3. My mother did not have any illness or disease prior to her death. While she was taking prescribed medication for a condition with her heart that developed when she was a child, my mother never demonstrated any effects from this. She never complained about chest pain, shortness of breath or any other symptoms which one may associate with a heart problem.
4. I have not given any medical records of my mother to the County Prosecutor, because, to the best of my knowledge, there are none to give.
5. I do not consent to the release of any medical information concerning my mother. If there was any factual basis for releasing records, then I would consent. But there are no such reasons. James Wilson strangled my mother to death. That is clear. He now seeks to escape justice by looking for ways to distort the truth and assert that my mother contributed to her own death.
6. James Wilson took my mother's life, and he destroyed mine. For the remainder of my life, an hour will not pass without my grieving over her death. She

contributed so much to her family and to others, and he killed her for no reason. To allow Wilson to further assault my mother and her loved ones through this baseless fishing expedition reduces us to valueless objects in the justice system. I will not authorize the release of my mother's medical information to him.

I hereby certify that all statements made by me are true to the best of my knowledge. I am aware that if any such statements are willfully false. I am subject to punishment.

D.L.

DATED: December 30, 2001

Certification of Attorney Pursuant to R. 1:4-4(c)

I am the attorney for the victims in the within matter. Pursuant to R. 1:4-4(c), I certify that the affiant acknowledged the genuineness of her signature and the original of this document will be provided to the Court if requested by the Court or any party.

Dated