**So Ordered**
**/s/ Calvin Scott Jul 23, 2026**

**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE**

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| JERMAINE MARLOW WRIGHT<br>Plaintiff, | : | |
| vs. | : | **DELAWARE WRONGFUL CONVICTION ACT CASE** |
| STATE OF DELAWARE<br>Defendant. | : | **Case No. N25C-12-120 CLS** |

**STIPULATION AND PROPOSED ORDER**
**GRANTING EXPUNGMENT AND CERTIFICATE OF INNOCENCE**

WHEREAS, Plaintiff Jermaine Wright ("Plaintiff") filed a claim for compensation under the Delaware Wrongful Conviction Compensation Act, 10 *Del. C.* Ch. 70;

WHEREAS, counsel to the parties have conferred and agree, that if Plaintiff had presented the petition to the Court so that it may hear the claim and render a decision, there would have been adequate evidence for the Court to determine that the Plaintiff made a prima facie showing of entitlement to compensation by establishing the requirements set forth in to 10 *Del. C.* § 7004(c) by a preponderance of the evidence. Given the parties' agreement that the Plaintiff would have prevailed on a cause of action under 10 *Del. C.* § 7004, he would have been entitled to various remedies as set forth in 10 *Del. C.* § 7005. In particular, § 7005(f) "Expungement of criminal record." states "[w]hen a petitioner prevails on a cause of action under § 7004 of this title, the court shall enter an order of expungement . . . pursuant to §4737

of Title 11[.]" Additionally, § 7005(g) "Certificate of innocence" states "[w]hen a petitioner prevails on a cause of action under § 7004, the Superior Court shall give notice to the Department of Justice" of its findings. "Within 60 days of receiving notice from the Superior Court, the Depart of Justice shall provide to the petitioner a 1-page letter on Department of Justice letterhead, signed by or on behalf of the Attorney General, that the petitioner has been found to be innocent of the crimes at issue[.]" Id.

The parties were able to resolve this matter without needing the Court to hear the claim, conduct a hearing, and render a decision. However, in light of the parties' agreement that the Plaintiff would have prevailed on the cause of action under 10 *Del. C.* § 7004 if the Court had heard the claim, and given the nature of the remedies set forth in subsections (f) and (g) of § 7005, the parties are jointly requesting that the Court issue an order awarding the Plaintiff an expungement of his criminal record and a certificate of innocence from the Department of Justice.

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THE STATE OF DELAWARE

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**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE**

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| JERMAINE MARLOW WRIGHT<br>Plaintiff, | :<br>: | |
| vs. | : | **DELAWARE WRONGFUL CONVICTION ACT CASE** |
| STATE OF DELAWARE<br>Defendant. | :<br>: | **Case No. N25C-12-120 CLS** |

**STIPULATION AND PROPOSED ORDER**
**GRANTING EXPUNGMENT AND CERTIFICATE OF INNOCENCE**

WHEREAS, Plaintiff Jermaine Wright ("Plaintiff") filed a claim for compensation under the Delaware Wrongful Conviction Compensation Act, 10 *Del. C.* Ch. 70; and wherefore counsel to the parties have conferred and agree, that if Plaintiff had presented the petition to the Court for it to hear the claim and render a decision, there would have been adequate evidence for the Court to determine that the Plaintiff made a prima facie showing of entitlement to compensation by establishing the requirements set forth in 10 *Del. C.* § 7004(c) by a preponderance of the evidence.

**NOW, THEREFORE, IT IS HEREBY ORDERED** this ___ day of _____, 2026, that:

1. Pursuant to 10 *Del. C.* § 7005(g) A Certificate of Innocence shall be issued to the Plaintiff by the Department of Justice within 60 days of this order; and

2. Pursuant to 10 *Del. C.* § 7005(f) the Court enters an order of expungement for all records pertaining to the arrest, prosecution, conviction, and incarceration of Jermaine Wright in the above-referenced matter.

SO ORDERED:

THE HONORABLE CALVIN L. SCOTT, JR.