

In *Rorie v. US*, No. 96-CF-363 (D.C. 7/28/05), the DCCA reversed the defendant's voluntary manslaughter conviction and remanded for a new trial based on erroneous self-defense jury instructions: the trial court erroneously referred to the defendant as the aggressor or the person who provoked the conflict.

*In re Ty.B.*, No. 01-FS-1307 (D.C. 7/21/05), is a neglect case with criminal overtones (father a suspect under investigation in disappearance of mother) which I overlooked last week. The DCCA reversed the adjudication of neglect because the admission of voluminous hearsay evidence (primarily alleged admissions of party opponent; secondarily excited utterances, present sense impressions, state of mind) was not harmless under *Kotteakos*. Decision contains interesting discussion of harmless error.