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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**  
J.N  
SEP 23 2005  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 02 CR 1050-6
	)	
PAUL SCHIRO,	)	Judge James B. Zagel
	)	
Defendant.	)	Second Superseding Indictment

DEFENDANT SCHIRO'S MOTION FOR  
LEAVE TO FILE ADDITIONAL PRETRIAL MOTIONS

Defendant PAUL SCHIRO, through his attorney, PAUL A. WAGNER, respectfully requests this Honorable Court for leave to file additional pretrial motions, if the need should arise. In support of this Motion, the following is stated:

The government has tendered 122 CDs and DVDs containing information pertaining to this indictment. This material includes thousands of recorded conversations, videotaped meetings, and reports concerning the various crimes alleged in the indictment. Although counsel has reason to believe that most of this material does not directly relate to the defendant, it is not physically (or mentally) possible for counsel to have reviewed all this material by this time in order to be confident in that belief.

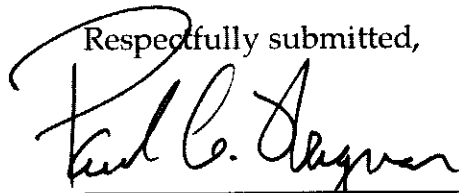
Furthermore, from August 8 to September 15, 2005, counsel was professionally occupied by being on trial before Judge Moran in United States v.

Thyfault, 03 CR 779-3. This seriously cutback on counsel's time for attending to the information tendered in this matter.

Also, it must be noted that the government has yet to provide to the defendants other significant information, such as the statements of witnesses, which might give rise to additional motions.

Counsel does not assume that additional pretrial motions will be necessary, but is merely advising the court of the situation and requesting leave to file additional motions should the need arise.

WHEREFORE, defendant PAUL SCHIRO respectfully requests this Honorable Court to grant his Motion.

Respectfully submitted,  
  
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Attorney for Paul Schiro

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