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IN THE **KEYBOARD**(Number (i.e. THIRD)) JUDICIAL DISTRICT COURT  
**KEYBOARD**(Name of County) COUNTY, STATE OF UTAH

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STATE OF UTAH,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. <b>KEYBOARD</b> (1:07-CR-78
<b>KEYBOARD</b> (DEFENDANT'S NAME),	)	DS)
	)	
Defendant.	)	Hon. <b>KEYBOARD</b> (David Sam)
	)	

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MOTION FOR DISCLOSURE OF PROMISES OF LENIENCY  
AND PRIOR FALSE STATEMENTS

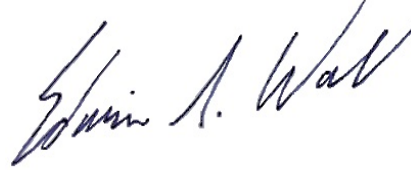
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COMES NOW the Defendant, **KEYBOARD**(Defendant's Name), by and through its attorney, Edwin S. Wall, Esq., and moves this Court moves the government be ordered to disclose any expectation, plea agreement or promise of leniency implied, suggested or made to any witness, or made in exchange or to encourage any conduct by said witness with respect to the above-named matter.

It is further moved that the government disclose any prior false statements made under oath or false affirmations made by a witness who will be called by the government, including each and all law enforcement officers; and specifically that the prosecution be ordered to

affirmatively make an inquiry as to any such false statements or affirmations. This motion is pursuant to Giglio v. United States, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed.2d 104 (1972).

Respectfully submitted DATE.

A handwritten signature in black ink that reads "Edwin S. Wall". The signature is written in a cursive style with a large, sweeping initial "E".


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Edwin S. Wall,  
Attorney for the Defendant

## CERTIFICATE OF SERVICE

I, Edwin S. Wall, hereby certify that on **DATE** I served a copy of the forgoing upon the counsel for the Plaintiff in this matter, by mailing it by CM/ECF or first class mail with sufficient postage prepaid to the following address:

**KEYBOARD**(Prosecutor's Name and Address)



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Edwin S. Wall,  
Attorney for the Defendant

[Proffered Order](#)