

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

UNITED STATES OF AMERICA,

v.

REALITY LEIGH WINNER,

Defendant.

CASE No. 1:17-CR-34-JRH-BKE

**MOTION FOR DISCLOSURE OF GRAND JURY TRANSCRIPTS
AND POINTS AND AUTHORITIES**

COMES NOW, Defendant **Reality Leigh Winner**, by and through her counsel, pursuant to rule 6(e), Federal Rules of Criminal Procedure, and moves this Honorable Court for an Order permitting Defendant to inspect and copy the recorded testimony of the following individuals who testified before the Grand Jury which returned the instant indictment:

1. Persons the government plans to call as witnesses at the trial;

POINTS AND AUTHORITIES

Any and all Grand Jury testimony should be disclosed anytime the government demonstrates no need for secrecy. Federal Rule of Criminal Procedure 6(e); *Nolan v. United States*, 395 F.2d 283 (5th Cir. 1968). Defendant believes that grand jury transcript will be helpful in providing a defense in this matter and respectfully requests its disclosure.

WHEREFORE, Defendant prays that this Court issue an Order requiring disclosure of grand jury transcripts of the nature set forth above in this case.

Respectfully submitted this 7th day of June, 2017.

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the date entered above I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all interested persons.

/s/Titus T. Nichols

/s/ John C. Bell, Jr.

Counsel for Defendant
