

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

UNITED STATES OF AMERICA)
)
v.) 08CR888
)
) Judge James B. Zagel
ROD BLAGOJEVICH)

MOTION FOR DISCOVERY

NOW COMES the Defendant, Rod Blagojevich, by and through one of his attorneys, Samuel F. Adam, and moves this Honorable Court pursuant to *United States v. Bagley*, 473 U.S. 667 (1985); *Brady v. Maryland*, 372 U.S. 83 (1963) and *Kyles v. Whitley*, 115 S.Ct. 1555 (1995), to enter an order requiring the government to produce the following requested materials so that the defense can adequately prepare and be ready for the trial currently set for June of 2010:

1. Any and all *Brady* and *Giglio* materials and all grand jury transcripts.
2. Any and all *Brady* and *Giglio* materials, grand jury transcripts and 302's that were provided to the defense in the case entitled United States v. Vrdolyak, 07 CR 298.
3. Any and all *Brady* and *Giglio* materials, grand jury transcripts and 302's that were provided to the defense in the case entitled United States v. Antoin Rezko, 05 CR 691.
4. Any and all *Brady* and *Giglio* materials, grand jury transcripts and 302's that were provided to the defense in the case entitled United States v. Cellini, 08 CR 888.
5. The defense agrees to be added to and bound by any and all protective orders issued in the above referenced cases.
6. A full list of witnesses the government believes they will call at trial in their case in chief.
7. All witness statements and 3500 materials in this case. We are requesting the government, if they oppose this request, to reveal the number of pages of materials so that this Honorable Court can appreciate why we are making this request now. We are moving for these materials 6 months prior to trial so that the June trial date will be realistic.
8. All notes, transcripts and reports generated from the government's interview of the following persons:

President Barack Obama
First Lady Michelle Obama
Rahm Emanuel
Valerie Jarrett
Thomas Balanoff
Andy Stern

WHEREFORE, the Defendant requests this Honorable Court grant this request so, once again, the defense is able to provide effective assistance of counsel and be prepared to go to trial in June of 2010.

Respectfully submitted,

/s/Samuel F. Adam
Attorney for the Defendant