

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

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 25 CR 693
	)	
ANDRE MARTIN, et al.	)	Hon. April M. Perry
	)	
Defendants.	)	

**AGREED MOTION FOR ISSUANCE OF RULE 17(c)  
SUBPOENAS AND EARLY RETURN THEREOF**

Defendant Andre Martin, by his attorneys, COTSIRILOS, POULOS & CAMPBELL, on behalf of all Defendants in this case and with the agreement of the Government, pursuant to Federal Rule of Criminal Procedure 17(c), moves this Honorable Court for the entry of an Order permitting the issuance of subpoenas for the production of documents to both government and defense counsel prior to trial. In support of this motion, Defendant states as follows:

1. Rule 17(c) of the Federal Rules of Criminal Procedure provides for the issuance of subpoenas to produce documentary evidence to be used at trial. Rule 17(c) also specifically allows the Court to direct the production of documents prior to the trial date. Thus, Rule 17(c) in pertinent part reads:

... the Court may direct that books, papers, documents or objects designated in the subpoena be produced before the Court at a time prior to the trial or prior to the time when they are to be offered in evidence and may, upon their production, permit the books, papers, documents or objects or portions thereof to be inspected by the parties and their attorneys.

2. In order to adequately prepare for trial, the Defendants request this Court enter an Order permitting the issuance of subpoenas returnable directly to counsel prior to trial.

3. Defendant Martin's counsel has conferred with the Government, and the Government has no objection to the Court granting this motion and allowing both the Defendants and the Government the same ability to issue subpoenas with early return dates.

**WHEREFORE**, Defendants respectfully requests that the Court enter an Order granting this Agreed Motion and permitting the issuance of Rule 17(c) subpoenas returnable directly to counsel prior to trial.

Respectfully submitted,

/s/ Terence H. Campbell  
An Attorney for Defendant  
Andre Martin  
On behalf of All Defendants

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