IN THE CIRCUIT COURT OF [*county*] COUNTY, WEST VIRGINIA

STATE OF WEST VIRGINIA,

v. [*case number*]

Hon. [*name*]

[*name-all caps*],

Defendant.

**MOTION FOR A CHANGE OF VENIRE**

On this date came Defendant, [*name*], by Counsel, [*name*], and moved this Honorable Court, pursuant to West Virginia Code § 52-1-14, as amended, to change the venire of jurors and to summon as many jurors as may be necessary from another county to serve in the captioned matter.

In support of this motion, Defendant asserts that qualified jurors, free from bias, prejudice or preexisting belief as to the guilt of Defendant, cannot be conveniently found in this county, and that it is necessary that jurors from another county be summoned to serve in this matter.

Therefore, Defendant requests that the court summon from another county as many jurors as may be necessary for the trial of this matter.

Dated this \_\_\_ day of [*month, year*].

[*defendant*],

By Counsel

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

[*counsel name*] [*bar number*]

[*address*]

[*phone number*]

[*email address*]

Counsel for Defendant