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

STATE OF WEST VIRGINIA,

v. [*case number*]

Hon. [*name*]

[*name-all caps*],

Defendant.

**MOTION TO DISCLOSE MATTERS**

**OCCURRING BEFORE THE GRAND JURY**

On this date comes Defendant, [*name*], by Counsel, [*name*], and moves this Honorable Court, pursuant to Rule 6(e)(3)(C)(ii) of the West Virginia Rules of Criminal Procedure, to order disclosure of matters occurring before the grand jury.

In support of said motion, Counsel asserts that the following matters which occurred before the grand jury may constitute grounds for dismissal of the indictment herein: [*state specific grounds for disclosure of grand jury matters*].

Therefore, the Defendant requests that this Honorable Court order disclosure of the requested matters occurring before the grand jury.

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

[*defendant*],

By Counsel

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

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

[*address*]

[*phone number*]

[*email address*]

Counsel for Defendant