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

STATE OF WEST VIRGINIA,

v. [*case number*]

Hon. [*name*]

[*name-all caps*],

Defendant.

**MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS**

On this date comes Defendant, [*name*], by Counsel, [*name*], and, pursuant to Rule 47 of the West Virginia Rules of Criminal Procedure, moves this Honorable Court for leave to file any additional motions as may be deemed necessary by Defendant herein.

In support of said motion, Defendant asserts that additional matters may come to the attention of counsel during trial preparation which may necessitate the filing of additional motions.

Defendant therefore requests that the Honorable Court grant Defendant leave to file any additional motions as may be deemed necessary by Defendant in the matter herein.

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

[*defendant*],

By Counsel

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

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

[*address*]

[*phone number*]

[*email address*]

Counsel for Defendant