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NO. 4-01-0435

IN THE

APPELLATE COURT OF ILLINOIS

FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the
)	Circuit Court of the
Plaintiff-Appellee,)	Eleventh Judicial Circuit,
)	McLean County, Illinois.
vs.)	
)	No. 99-CF-1016
JAMIE C. SNOW,)	
)	Honorable
Defendant-Appellant.)	Donald D. Bernardi,
)	Judge Presiding.

MOTION TO COMPEL PRODUCTION OF TRANSCRIPTS OF TRIAL OF SUSAN POWELL CLAYCOMB

PROPOSED ORDER

NOTICE OF MOTION AND PROOF OF SERVICE

FILED
JAN 3 - 2008
MCLEAN COUNTY
CIRCUIT CLERK

DANIEL D. YUHAS
Deputy Defender
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Assistant Defender

COUNSEL FOR DEFENDANT-APPELLANT

NO. 4-01-0435

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FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,

Plaintiff-Appellee,

vs.

JAMIE C. SNOW,

Defendant-Appellant.

) Appeal from the
) Circuit Court of the
) Eleventh Judicial Circuit,
) McLean County, Illinois.

) No. 99-CF-1016

) Honorable
) Donald D. Bernardi,
) Judge Presiding.

NOTICE OF MOTION AND PROOF OF SERVICE

TO: State's Attorneys Appellate
Prosecutor
725 South Second Street
Springfield, IL 62704

✓ Jamie C. Snow
Register No. N-50072
Box 112
Joliet, IL 60434

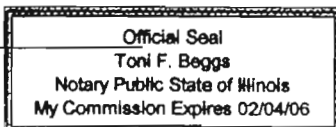
William A. Yoder
McLean County State's Attorney
Law & Justice Center, 104 West Front
P.O. Box 2400
Bloomington, IL 61701

Please take notice that I have delivered the original and three copies of the Motion to Compel Production of Transcripts of Trial of Susan Powell Claycomb to the Clerk of the above Court, that I am serving the SAAP with one copy by State of Illinois Messenger Service, and I am serving the State's Attorney and Defendant with one copy of said motion by depositing the copies in the mail in Springfield, Illinois, in envelopes with sufficient prepaid postage and addressed as indicated above on this 24 day of September, 2003.

Candice Remington
CANDICE REMINGTON
Legal Secretary

SUBSCRIBED AND SWORN
to before me this 24th day
of September, 2003.

Toni F. Beggs
NOTARY PUBLIC



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)	Circuit Court of the
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JAMIE C. SNOW,)	Honorable
)	Donald D. Bernardi,
Defendant-Appellant.)	Judge Presiding.

**MOTION TO COMPEL PRODUCTION OF
TRANSCRIPTS OF TRIAL OF SUSAN POWELL CLAYCOMB**

Now comes Karen Munoz, Assistant Defender, Office of the State Appellate Defender, Fourth Judicial District, and respectfully requests that this Court compel the McLean County Circuit Clerk to produce a certified copy of the transcripts of the trial of Jamie Snow's co-defendant, Susan Powell Claycomb, McLean County No. 99-CF-1017. As grounds, Karen Munoz states on oath as follows:

1. Jamie Snow and Susan Powell Claycomb were separately charged and tried with first degree murder in the death of William Little.
2. Susan Powell Claycomb went to trial first, and she was acquitted.
3. Mr. Snow alleged ineffective representation by his trial attorneys, alleging, among other things, the failure to call certain witnesses and the failure to lay a foundation for impeachment of State's witnesses.

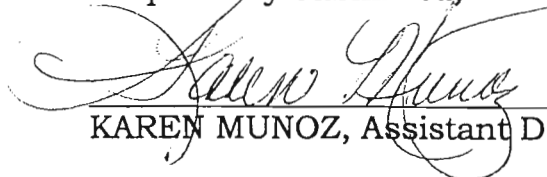
4. Several witnesses in question were impeached by Ms. Powell Claycomb's attorney at her trial. Other witnesses known to Mr. Snow's attorneys, were also called at the Powell Claycomb trial.

5. Transcripts of portions of the Powell Claycomb trial were admitted in the trial court in this case in response to the defendant's claims regarding ineffective assistance and the failure to call certain witnesses and failure to impeach others. However, a certified transcript of all the trial proceedings is not included in Mr. Snow's record on appeal.

6. An issue of ineffective assistance of counsel is being raised in the instant case. In order to adequately argue the issue, review of Susan Powell Claycomb's trial transcripts is necessary to determine whether Mr. Snow's attorneys had evidence to cross-examine and possibly impeach State's witnesses in the Snow trial, and whether certain witnesses called in the Powell Claycomb trial were known to Mr. Snow's attorneys, could have been beneficial to the defense, and because of neglect by counsel were not called.

WHEREFORE, for the foregoing reasons, it is requested that this Court order the Circuit Clerk of McLean County to produce the trial transcripts of Susan Powell Claycomb for which she was acquitted of the murder of William Little.

Respectfully submitted,


KAREN MUNOZ, Assistant Defender

COUNSEL FOR DEFENDANT-APPELLANT

SUBSCRIBED AND SWORN
to before me this 24 day
of September, 2003.


NOTARY PUBLIC
OFFICIAL SEAL
CANDICE REMINGTON
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 7-26-2004

NO. 4-01-0435

IN THE

APPELLATE COURT OF ILLINOIS

FOURTH JUDICIAL DISTRICT

PEOPLE OF THE STATE OF ILLINOIS,)	Appeal from the
)	Circuit Court of the
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)	McLean County, Illinois.
vs.)	No. 99-CF-1016
JAMIE C. SNOW,)	Honorable
)	Donald D. Bernardi,
Defendant-Appellant.)	Judge Presiding.

ORDER

On motion of counsel for defendant-appellant, Jamie Snow, the McLean County Circuit Clerk is directed to produce a certified copy of the trial transcripts in *People v. Susan Powell Claycomb*, No. 99-CF-1017.

ENTER: _____

JUSTICE

JUSTICE

JUSTICE