

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 06-CR-30098-DRH
	)	
AJIT TRIKHA	)	
Defendants.	)	

**DEFENDANT AJIT TRIKHA’S MOTION FOR DISCLOSURE OF GRAND JURY  
TRANSCRIPTS**

Comes now Defendant Ajit Trikha and for his Motion for Disclosure of Grand Jury Transcripts states:

1. Ordinarily a Defendant is not entitled to disclosure of grand jury transcripts pursuant to Federal Rules of Criminal Procedure 6(e)(3)(E)(I) and 16(a).
2. In the instant case Defendant states on information and belief that two employees of TRX Health Systems, P.C. Carolin Ehlers-Johns and Chrissy Powers testified before the grand jury.
3. Defendant requires these transcripts in order to adequately prepare for trial.
4. Earlier this date, the undersigned spoke with Assistant U.S. Attorney Quinley who indicated that he would agree to early disclosure of grand jury transcripts in this case for any agent, employee, director, or officer of TRX Health Systems, P.C.
5. As such Mr. Quinley indicated he would not oppose this Motion.

WHEREFORE, Defendant requests that his Motion for Disclosure of Grand Jury Transcripts be granted.

AJIT TRIKHA

STOBBS LAW OFFICES

BY:

/s/ John D. Stobbs, II

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2007 a copy of the attached ***DEFENDANT AJIT TRIKHA'S MOTION FOR DISCLOSURE OF GRAND JURY TRANSCRIPTS*** was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Michael Quinley  
Assistant U.S. Attorney  
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Fairview Heights, Illinois 62208

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