

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NUMBER: 2:16-cr-378
)	
-versus-)	
)	MOTION FOR A DISTRICT-WIDE JURY
MICHAEL THOMAS SLAGER,)	
)	
Defendant.)	
_____)	

Michael Slager, defendant in the above-titled litigation, was indicted by a Federal Grand Jury in the District of South Carolina (Charleston Division) on May 10, 2016, and charged with:

Count One: Deprivation of Rights Under Color of Law in violation of Title 18, United States Code, Section 242;

Count Two: Use of a Weapon During the Commission of a Crime of Violence in violation of Title 18, United States Code, Section 924 (c) (1)(A)(iii); and

Count Three: Obstruction of Justice in violation of Title 18, United States Code, Section 1512 (b)(3).

By Order of this Court dated May 11, 2016, Andrew J. Savage, III was appointed as lead counsel for Mr. Slager.

On May 16, 2016, Mr. Slager was arraigned and entered a plea of Not Guilty.

On December 13, 2016, the Honorable David C. Norton held an informal pretrial conference and thereafter advised the parties that this matter was scheduled for disposition by trial in May of 2017.

The Court scheduled jury selection for May 1, 2017, and the last date for filing a request for specific *voir dire* is January 17, 2017.

To insure the efficient selection of impartial jurors, Mr. Slager respectfully requests the Court find that, due to the extensive pretrial publicity in this case, the services of a district-wide petit jury is required.

Accordingly, Mr. Slager, through his appointed counsel, requests the Court to find that good cause having been shown to use a district-wide petit jury in the matter of the United States of America versus Michael Thomas Slager, Criminal Number 2:16-cr-378, the Clerk of Court shall draw names from each jury area based on each area's percentage of the total names in the master jury wheel.¹

Respectfully submitted,

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¹Jury Selection Plan for the Random Selection of Grand and Petit Jurors of the United States District Court for the District of South Carolina (as amended on October 29, 2014).

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ATTORNEYS FOR DEFENDANT

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January 7, 2017.