

**Excerpt from the Juvenile Defender Delinquency Notebook:
A Case Preparation System for New Juvenile Defenders**

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FORM F20. PRE-TRIAL MOTION WORKSHEET

Client's Name: _____
Docket Number: _____
Judge: _____ Courtroom: _____
Completed by: _____ Date Completed: _____

1. Consider whether any of the following pre-trial motions should be submitted.

Area	Type of motion	Date Due/ Completed	Date Filed
Representation	<input type="checkbox"/> Motion for Appointment of Counsel <input type="checkbox"/> Motion to Withdraw as Counsel <input type="checkbox"/> Motion to Proceed <i>In Forma Pauperis</i> <input type="checkbox"/> Motion for Appointment of a Guardian <i>Ad Litem</i>		
Defects with the petition	<input type="checkbox"/> Motion to Dismiss for Failure To State an Offense <input type="checkbox"/> Motion to Dismiss for Lack of Jurisdiction <input type="checkbox"/> Motion to Dismiss for Failure To Establish Venue <input type="checkbox"/> Motion to Dismiss (for lack of specificity) <input type="checkbox"/> Motion to Dismiss Because the Statute of Limitations Has Lapsed		
Double jeopardy	<input type="checkbox"/> Motion to Dismiss for Double Jeopardy Violation		
Multiple/joined counts	<input type="checkbox"/> Motion for Severance (of multiple counts)		
Co-respondent(s) or co-respondent(s)	<input type="checkbox"/> Motion for Severance (of the joined trial)		
Social reasons	<input type="checkbox"/> Motion to Dismiss for Social Reasons		
Change of Venue or Judge	<input type="checkbox"/> Motion for a Change of Venue <input type="checkbox"/> Motion for a Change of Judge		
Speedy trial	<input type="checkbox"/> Motion to Dismiss for Lack of Speedy Trial		

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Jury trial	<input type="checkbox"/> Motion for a Jury Trial		
Suppression of evidence	<input type="checkbox"/> Motion to Suppress Physical Evidence (Fourth Amendment Issues) <input type="checkbox"/> Motion to Suppress a Confession or Statements <input type="checkbox"/> Motion to Suppress an Identification <input type="checkbox"/> Motion to Strike		
Evidence	<input type="checkbox"/> Motion for Protective Order <input type="checkbox"/> Motion to Fingerprint <input type="checkbox"/> Motion to Photograph <input type="checkbox"/> Motion to Polygraph Test		
Discovery	<input type="checkbox"/> Motion for Discovery <input type="checkbox"/> Motion for Additional Discovery <input type="checkbox"/> Motion for a Bill of Particulars <input type="checkbox"/> Motion for <i>In Camera</i> Inspection <input type="checkbox"/> Motion to Quash a Subpoena/ Subpoena <i>Duces Tecum</i> <input type="checkbox"/> Motion for a List of Witnesses <input type="checkbox"/> Motion for Disclosure of Plea Agreement <input type="checkbox"/> Motion for Disclosure of Preferential Agreements with Witnesses <input type="checkbox"/> Motion for Disclosure of Criminal Records of Witnesses <input type="checkbox"/> Motion for Production of Mental Health Records of Complainant <input type="checkbox"/> Motion for Disclosures Relating to Expert Witnesses <input type="checkbox"/> Motion for a Free Transcript <input type="checkbox"/> Motion for Discovery and Inspection of Scientific Tests and Reports		
Discovery or subpoena violations	<input type="checkbox"/> Motion to Show Cause <input type="checkbox"/> Motion to Compel Discovery <input type="checkbox"/> Motion for Sanctions for Failure to Comply with Discovery		
Witnesses	<input type="checkbox"/> Motion to Close Proceedings <input type="checkbox"/> Motion to Sequester Witnesses		
Expert/Special Witnesses	<input type="checkbox"/> Motion for Court Payment of Expert Witness <input type="checkbox"/> Motion for Court-Appointed Translator <input type="checkbox"/> <i>Ex Parte</i> Motion for Expenses of Investigator <input type="checkbox"/> <i>Ex Parte</i> Motion for Expenses		
Time Schedule/ Leave of court	<input type="checkbox"/> Motion to Advance the Trial Date <input type="checkbox"/> Motion for Continuance		

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	<input type="checkbox"/> Motion for Extension of Time in Which to File Pre-Trial Motions <input type="checkbox"/> Motion for Leave to File Additional Motions		
Prosecution unprepared	<input type="checkbox"/> Motion to Dismiss for Want of Prosecution (with or without prejudice)		
Medical Examination/ Treatment	<input type="checkbox"/> Motion for Medical Treatment <input type="checkbox"/> Motion for Medical Examination <input type="checkbox"/> Motion for Medical Examination of Complainant		
Competency	<input type="checkbox"/> Motion for a Competency Hearing		
Miscellaneous	<input type="checkbox"/> Petition for Writ of Habeas Corpus Seeking Release of Individual Detained Without Process		

2. For any of the pre-trial motions you have selected, is interlocutory review available? If so, should you seek interlocutory review if you lose a motion?

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