

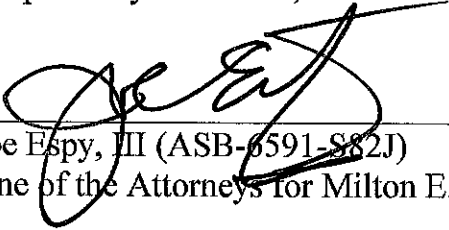
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) CR. NO. 2:10cr186-MHT-001
)
 MILTON E. McGREGOR, et al.)
)
 Defendants.)

**DEFENDANT'S MOTION FOR DISCLOSURE OF EXISTENCE
AND SUBSTANCE OF PROMISES OF IMMUNITY, LENIENCY, OR OTHER
BENEFIT OR PREFERENTIAL TREATMENT**

Defendant, Milton E. McGregor, respectfully moves the Court to enter an order requiring the Government to disclose the existence and substance of any promises to or agreements made with any person, in connection with the investigation giving rise to this case and/or the prosecution of this case. This request encompasses any promises or agreements regarding immunity, leniency, deferred prosecution, or similar matters; actions or decisions in regard to sentencing; special witness fees; assistance to family member; or any other treatment or benefit of any kind which could act as an inducement to testify, to provide evidence, or to color testimony. Defendant is entitled to and needs said information in order to prepare for the trial of this case.

Respectfully submitted,



Joe Espy, III (ASB-6591-882J)
One of the Attorneys for Milton E. McGregor

OF COUNSEL:

Benjamin J. Espy (ASB-0699-A64E)
William M. Espy (ASB-0707-A41E)
MELTON, ESPY & WILLIAMS, P.C.
P.O. Drawer 5130
Montgomery, AL 36103
Telephone: 334-263-6621
Facsimile: 334-263-7252
jespy@mewlegal.com
bespy@mewlegal.com
wespy@mewlegal.com

Fred D. Gray (ASB-1727-R63F)
Walter E. McGowan (ASB-8611-N27W)
GRAY, LANGFORD, SAPP
McGOWAN, GRAY, GRAY
& NATHANSON, P.C.
P.O. Box 830239
Tuskegee, AL 36083-0239
Telephone: 334-727-4830
Fax: 334-727-5877
fgray@glsmgn.com
wem@glsmgn.com

Robert D. Segall (ASB-7354-E68R)
David Martin (ASB-7387-A54J)
Shannon Holliday (ASB-5440-Y77S)
COPELAND, FRANCO, SCREWS & GILL, P.A.
P.O. Box 347
Montgomery, Alabama 36101-0347
Telephone: 334-834-1180
Fax: 334-834-3172
segall@copelandfranco.com
martin@copelandfranco.com
holliday@copelandfranco.com

Sam Heldman (ASB 3794 N60S)
THE GARDNER FIRM, P.C.
2805 31st Street NW
Washington, DC 20008
Telephone: (202) 965-8884
Fax: (202) 318-2445
sam@heldman.net

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following electronically and via regular mail, postage prepaid and properly addressed on this the

5 day of October 2010.

Peter Ainsworth
US Department of Justice
Public Integrity Section
1400 New York Avenue, NW
Washington, DC 20005
Peter.ainsworth@usdoj.gov

Peter Ainsworth
Louis Franklin
Steve Feaga
Federal Bureau of Investigation
One Commerce Street, Suite 500
Montgomery, AL 36101
Steve.Feaga@usdoj.gov
louis.franklin@usdoj.gov



Of Counsel