

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CR No. 2:10cr186-MHT</b>
	)	
<b>RONALD GILLEY, et al.</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT RONALD GILLEY'S MOTION TO COMPEL**

Comes now Ronald Gilley, by and through his undersigned counsel, and respectfully requests this Court to compel the Government to produce the following information: (1) non-redacted copies of Form 302s of Jarrod Massey; (2) all Form 302s from FBI case numbers ending in 46187 and 44533; (3) grand jury transcripts of witnesses related to the same FBI case numbers; (4) *Brady* Material including drafts of plea agreements and information relating to recent interview(s) of Larry Langford; (5) Text messages, e-mails or other electronic communication between an agent or prosecutor and any witness, (6) tape recordings made by Houston County Sheriff Andy Hughes as referenced in his various Form 302s, (7) consensual recording information and (8) Title III Wiretap information. In addition, Gilley seeks the following information specifically relating to the Title III Wiretaps: (1) line-sheet minimization reports; (2) electronic surveillance logs; (3) document summary reports; (4) case statistical breakdown; (5) statistical summary reports; (6) session history for non-privileged, pertinent recordings; (7) user line assignments/reports; (8) identification of call monitors and (i) any formal or informal minimization procedures.

As grounds for and in support of his motion, Gilley has submitted a memorandum of law contemporaneously herewith. Pursuant to the standing order on criminal discovery, Mr. Gilley's counsel affirmatively certifies that he has conferred with opposing counsel regarding these issues (*See Exhibit A*), and has made a good faith effort to resolve the subject matter of the motion by agreement with opposing counsel.

Respectfully submitted,

/s/ G. Douglas Jones  
G. Douglas Jones  
ASB-3880-s82g

**OF COUNSEL:**

Thomas J. Butler (ASB-7790-T75T)  
Anil A. Mujumdar (ASB-2004-165m)  
Haskell Slaughter Young & Rediker, LLC  
1400 Park Place Tower  
2001 Park Place  
Birmingham, AL 35203  
Phone: (205) 251-1000  
[gdj@hsy.com](mailto:gdj@hsy.com)

Sandra Payne Hagood (ASB-0360-S73H)  
7660 Fay Avenue  
Suite H-526  
LaJolla, CA 92307  
Phone: 858-245-5741  
[sandra@hagoodappellate.com](mailto:sandra@hagoodappellate.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this the 30th day of December, 2010, filed the foregoing with the Clerk of Court via CM/ECF and an electronic copy of the same has been sent to the following:

Louis V. Franklin, Sr.  
Assistant U. S. Attorney  
131 Clayton Street  
Montgomery, Alabama 36104  
[Louis.franklin@usdoj.gov](mailto:Louis.franklin@usdoj.gov)

Stephen P. Feaga  
U.S. Attorney's Office  
P.O. Box 197  
Montgomery, AL 36101-0197  
[Steve.feaga@usdoj.gov](mailto:Steve.feaga@usdoj.gov)

Peter J. Ainsworth  
U.S. Department of Justice  
Public Integrity Section  
1400 New York Avenue-NW 12<sup>th</sup> Floor  
Washington, DC 20005  
[Peter.Ainsworth@usdoj.gov](mailto:Peter.Ainsworth@usdoj.gov)

Eric Olshan  
U.S. Department of Justice  
Public Integrity Section  
1400 New York Avenue-NW 12<sup>th</sup> Floor  
Washington, DC 20005  
[Eric.olshan@usdoj.gov](mailto:Eric.olshan@usdoj.gov)

Barak Cohen  
U.S. Department of Justice  
Public Integrity Section  
1400 New York Avenue-NW 12<sup>th</sup> Floor  
Washington, DC 20005  
[Barak.cohen@usdoj.gov](mailto:Barak.cohen@usdoj.gov)

Brenda Morris  
U.S. Department of Justice  
Public Integrity Section  
1400 New York Avenue-NW 12<sup>th</sup> Floor  
Washington, DC 20005  
[Brenda.Morris@usdoj.gov](mailto:Brenda.Morris@usdoj.gov)

Emily Rae Woods  
U.S. Department of Justice  
Public Integrity Section  
1400 New York Avenue-NW 12<sup>th</sup> Floor  
Washington, DC 20005  
[Rae.woods@usdoj.gov](mailto:Rae.woods@usdoj.gov)

Joe Espy, III  
MELTON, ESPY & WILLIAMS, PC  
P.O. Box Drawer 5130  
Montgomery, AL 36103  
[jespy@mewlegal.com](mailto:jespy@mewlegal.com)

William M. Espy  
MELTON, ESPY & WILLIAMS, PC  
P.O. Box Drawer 5130  
Montgomery, AL 36103  
[wespy@mewlegal.com](mailto:wespy@mewlegal.com)

Benjamin J. Espy  
MELTON, ESPY & WILLIAMS, PC  
P.O. Box Drawer 5130  
Montgomery, AL 36103  
[bespy@mewlegal.com](mailto:bespy@mewlegal.com)

Fred D. Gray  
Waiter E. McGowan  
GRAY, LANGFORD, SAPP  
McGOWAN, GRAY, GRAY  
& NATHANSON, P.C.  
P.O. Box 830239  
Tuskegee, AL 36083-0239  
[fgray@glsmgn.com](mailto:fgray@glsmgn.com)  
[wem@glsmgn.com](mailto:wem@glsmgn.com)

Robert D. Segall  
COPELAND, FRANCO, SCREWS &  
GILL, P.A.  
P.O. Box 347  
Montgomery, Alabama 3610 1-0347  
[segall@copelandfranco.com](mailto:segall@copelandfranco.com)

David Martin  
COPELAND, FRANCO, SCREWS &  
GILL, P.A.  
P.O. Box 347  
Montgomery, Alabama 3610 1-0347  
[martin@copelandfranco.com](mailto:martin@copelandfranco.com)

Shannon Holliday  
COPELAND, FRANCO, SCREWS &  
GILL, P.A.  
P.O. Box 347  
Montgomery, Alabama 3610 1-0347  
[holliday@copelandfranco.com](mailto:holliday@copelandfranco.com)

Sam Heldman  
THE GARDNER FIRM, P.C.  
2805 31st Street NW  
Washington, DC 20008  
[sam@heldman.net](mailto:sam@heldman.net)

Stewart D. McKnight  
Baxley, Dillard, Dauphin, McKnight  
& Barclift  
2008 Third Avenue South  
Birmingham, AL 35233  
[dmcknight@bddmc.com](mailto:dmcknight@bddmc.com)

Joel E. Dillard  
Baxley, Dillard, Dauphin, McKnight  
& Barclift  
2008 Third Avenue South  
Birmingham, AL 35233  
[jdillard@bddmc.com](mailto:jdillard@bddmc.com)

William J. Baxley  
Baxley, Dillard, Dauphin, McKnight  
& Barclift  
2008 Third Avenue South  
Birmingham, AL 3523  
[wbaxley@bddmc.com](mailto:wbaxley@bddmc.com)

Brett M. Bloomston  
Attorney at Law  
1330 21st Way South, Ste 120  
Birmingham, AL 35205  
[Brettbloomston!@hotmail.com](mailto:Brettbloomston!@hotmail.com)

William N. Clark  
Stephen W. Shaw  
Redden Mills & Clark  
505 North 20th Street, Suite 940  
Birmingham, AL 35203  
[wnc@rmclaw.com](mailto:wnc@rmclaw.com)  
[sws@rmclaw.com](mailto:sws@rmclaw.com)

Ron W. Wise  
Attorney at Law  
200 Interstate Park Drive, Suite 105  
Montgomery, AL 36109  
[ronwise@aol.com](mailto:ronwise@aol.com)

H. Lewis Gillis  
Thomas Means Gillis & Seay  
P.O. Drawer 5058  
Montgomery, AL 36103  
[hlgillis@tmgslaw.com](mailto:hlgillis@tmgslaw.com)

Latasha M. Nickle  
Thomas Means Gillis & Seay  
P.O. Drawer 5058  
Montgomery, AL 36103  
[lameadows@tmgslaw.com](mailto:lameadows@tmgslaw.com)

Tyrone C. Means  
Thomas Means Gillis & Seay  
P.O. Drawer 5058  
Montgomery, AL 36103  
[tcmeans@tmgslaw.com](mailto:tcmeans@tmgslaw.com)

J. W. Parkrnan, III  
Parkman, Adams & White  
505 20th Street North, Suite 825  
Birmingham, AL 35203  
[parkman@parkmanlawfirm.com](mailto:parkman@parkmanlawfirm.com)

Richard M. Adams  
Parkman, Adams & White  
505 20th Street North, Suite 825  
Birmingham, AL 35203  
[adams@parkmanlawfirm.com](mailto:adams@parkmanlawfirm.com)

William C. White, II  
Parkman, Adams & White  
505 20th Street North, Suite 825  
Birmingham, AL 35203  
[White@parkmanlawfirm.com](mailto:White@parkmanlawfirm.com)

Susan G. James  
Denise A. Simmons  
Susan G. James & Associates  
600 S. McDonough Street  
Montgomery, AL 36104  
[sgjamesandassoc@aol.com](mailto:sgjamesandassoc@aol.com)  
[dsimlaw@aol.com](mailto:dsimlaw@aol.com)

Thomas M. Goggans  
Attorney at Law  
2030 East Second Street  
Montgomery, AL 36106  
[tgoggans@tgoggans.com](mailto:tgoggans@tgoggans.com)

Samuel H. Franklin  
Jackson R. Sharman, III  
LIGHTFOOT, FRANKLIN  
& WHITE, L.L.C.  
The Clark Building  
400 North 20th Street  
Birmingham, AL 35203  
[sfrankln@lightfootlaw.com](mailto:sfrankln@lightfootlaw.com)  
[jsharman@lighfootlaw.com](mailto:jsharman@lighfootlaw.com)

Joseph J. Basgier, III  
Bloomston & Basgier  
1330 21<sup>st</sup> Way South, Suite 120  
Birmingham, AL 35235  
[joebasgier@gmail.com](mailto:joebasgier@gmail.com)

John M. Englehart  
Englehart Law Office  
9457 Alysbury Place  
Montgomery, AL 36117-6005  
[jmenglehart@gmail.com](mailto:jmenglehart@gmail.com)

Joshua L. McKeown  
The Cochran Firm Criminal Defense-  
Birmingham LLC  
505 20<sup>th</sup> Street North  
Suite 825  
Birmingham, AL 35203  
[jmckeown@parkmanlawfirm.com](mailto:jmckeown@parkmanlawfirm.com)

Jeffery Clyde Duffey  
Law Office of Jeffery C. Duffey  
600 South McDonough Street  
Montgomery, AL 36104  
[jcduffey@aol.com](mailto:jcduffey@aol.com)

/s/ G. Douglas Jones  
OF COUNSEL

