

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
v.) **CR. NO. 2:10cr186-MHT**
)
QUINTON T. ROSS, JR.)

**QUINTON T. ROSS, JR.'S MOTION TO DISMISS
BASED ON GRAND JURY INSTRUCTIONS**

Quinton T. Ross, Jr., hereby moves that the Indictment against him be dismissed based on the lack of jury instructions, or the erroneous jury instructions, given to the Grand Jury that returned the Indictment in this case. Senator Ross hereby adopts and incorporates by reference, as if fully set out herein, the arguments, points of law, and requests for relief contained in the Motion to Dismiss Based on Grand Jury Instructions filed by Milton C. McGregor (Doc. no. 1212, filed June 1, 2011).¹

WHEREFORE, PREMISES CONSIDERED, Quinton T. Ross, Jr., requests this Court enter an order (a) allowing him to adopt the arguments, points of law, and requests for relief contained in Document no. 1212, (b) granting this motion, (c) dismissing the Indictment against him, and (d) further granting the relief sought herein.

¹ In the alternative, if leave is required, Senator Ross moves and respectfully requests leave to adopt all arguments, points of law, and requests for relief contained in the Motion to Dismiss Based on Grand Jury Instructions filed by Milton C. McGregor (Doc. no. 1212, filed June 1, 2011).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Mark Englehart

MARK ENGLEHART