

[Note that the discovery demand and request for particulars are intended as Exhibits A and B in the omnibus motion.]

_____ COURT OF _____
COUNTY OF _____

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THE PEOPLE OF THE STATE OF NEW YORK

NOTICE OF
OMNIBUS MOTION

-against-

Index No. _____

[NAME],

Accused.

-----X

SIR OR MADAM :

PLEASE TAKE NOTICE, that upon the annexed affirmation of _____, the attorney of record for the accused _____, the annexed exhibits, and upon all the proceedings had heretofore, a motion will be made in the _____ Court of _____, County of _____, Part ____, at the Courthouse at _____, _____, New York, on the ____ day of _____, _____, at ____ in the forenoon or as soon thereafter as counsel may be heard for the following Orders granting:

[The list below is not exhaustive of the motions that may be made at the pretrial phase of a criminal case. Any or all of the following motions may be used as applicable to the facts, charges and circumstances of your client's case. Defense counsel also may include other motions, as necessary, in this omnibus motion.]

- I. Inspection and reduction or dismissal of the Indictment pursuant to CPL §§ 210.20 and 210.30, due to the legal insufficiency of the proof submitted to the grand jury.
- II. Motion to inspect and transcribe the grand jury minutes.
- III. Motion for release of the grand jury minutes and charge to defense.
- IV. Motion to suppress certain statements allegedly made by the accused.
- V. Motion to suppress property seized from the accused.
- VI. Motion to suppress the out of court identification made by the complainant.