

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA, )  
Plaintiff, )  
 )  
vs. )  
 ) Case No.  
Defendant. )

MOTION TO ADOPT AND CONFORM APPLICABLE  
MOTIONS OF EACH AND EVERY OTHER CO-DEFENDANT  
AND MEMORANDUM IN SUPPORT THEREOF

COMES NOW Defendant, above, by and through undersigned counsel, and respectfully moves to adopt, conform and have the benefit of applicable motions filed by any co-defendant charged in the above-styled action. As grounds for this motion, defendant states as follows:

- (1) Defendant is charged in this case with other defendants. Counsel for defendant is aware that counsel for co-defendants will file motions that may well be applicable to each defendant.
- (2) So as to reduce the burden on this Court and with respect to repetitive pleadings, defendant hereby adopts all applicable motions of any co-defendant. Defendant will conform them, if necessary, and, if appropriate, will add supplemental memoranda in support thereof. If defendant does not intend to adopt a motion of a co-defendant, the Court will be notified promptly. Otherwise, defendant will have been presumed to have adopted all motions of his co-defendants, not inconsistent with defendant's position.
- (3) Discovery proceedings are still in progress. Due to the complexity of this case and the nature of the charges, the above relief is necessary in the interest of justice, for due process of law, and for effective assistance of counsel.

WHEREFORE, defendant respectfully requests that this Motion to Adopt and Conform Applicable Motions of Other Defendants be granted.

Respectfully submitted,

Glen R. Graham OBA 12110  
Attorney for Defendant  
1612 S. Cincinnati Ave  
Tulsa, OK 74119 (918) 583-4621

Certificate of Delivery

This is to certify that the undersigned hand delivered a true and correct copy of this motion to the Office of the Tulsa County District Attorney on the 9<sup>th</sup> Floor, Tulsa County Court House, 500 S. Denver Ave., Tulsa, OK, on the same day it was filed with the Tulsa County Criminal Court Clerk.

By: \_\_\_\_\_  
GLEN R. GRAHAM