

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 22-CR-00115
v.	)	
	)	Honorable John Robert Blakey
MICHAEL J. MADIGAN and	)	
MICHAEL F. McCLAIN,	)	Magistrate Judge Jeffrey Cole
	)	
Defendants.	)	

**MICHAEL J. MADIGAN’S MOTION TO DISMISS
CERTAIN COUNTS OF THE SUPERSEDING INDICTMENT**

Pursuant to Fed. R. Crim. P. 12(b)(3)(B)(v), Michael J. Madigan, by his undersigned counsel, moves this Court to dismiss Counts One through Seven, Eleven through Fourteen, and Twenty-One through Twenty-Three of the Superseding Indictment (ECF No. 37), either in full or in part, as detailed in the Memorandum of Law filed in support of this Motion. After conferral, counsel for the government stated that it opposes this Motion.

Dated: February 28, 2023

Respectfully submitted,

By: /s/ Sheldon T. Zenner

Sheldon T. Zenner, Esq. (ARDC #3122184)
Gil M. Soffer, Esq. (ARDC #6201959)
Daniel J. Collins, Esq. (ARDC #6224698)
Lari A. Dierks, Esq. (ARDC #6329610)
Ian A. Vitalis, Esq. (ARDC #6333510)
Katten Muchin Rosenman LLP
525 West Monroe Street
Chicago, Illinois 60661
(312) 902-5476
Sheldon.Zenner@Katten.com
Gil.Soffer@Katten.com
Daniel.Collins@Katten.com
Lari.Dierks@Katten.com
Ian.Vitalis@Katten.com

Attorneys for Defendant Michael J. Madigan