

IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI

STATE OF MISSOURI,	)	
	)	
Plaintiff	)	
	)	
v.	)	Case No. 19BA-CR04782-01
	)	
JOSEPH DUANE ELLEDGE,	)	
	)	
Defendant.	)	

**DEFENDANT’S SUGGESTIONS FOR CHANGE OF VENUE COUNTIES**

Per the Court’s request for Defendant’s counsel to recommend three counties for change of venue, the Defendant is only going to submit Pettis County.

The Court indicated it would be calling the respective jurisdiction where the Court decides to send the case for the purpose of jury selection and scheduling. Knowing this would be a scheduling and logistical issue for this Court and the Court in the respective county of the change, as a courtesy to the Court, I would like to advise the Defendant will be filing motions this week that may affect the trial date of February 25, 2020.

Respectfully submitted,

/s/ John P. O’Connor  
 John P. O’Connor                      MO #32352  
 4740 Grand Avenue, Suite 300  
 Kansas City, MO 64112  
[joconnor@wellp.com](mailto:joconnor@wellp.com)  
 (816) 701-1100; Fax (816) 531-2372

/s/ Patrick J. O’Connor  
 Patrick J. O’Connor                      MO #52544  
 4740 Grand Avenue, Suite 300  
 Kansas City, MO 64112  
[pjoconnor@wellp.com](mailto:pjoconnor@wellp.com)  
 (816) 701-1100; Fax (816) 531-2372

ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of February, 2020, a true copy of the foregoing document was filed utilizing this Court's ECF system, and that a copy of the foregoing document was then served via this Court's system for electronic distribution to all counsel and parties of record.

/s/ John P. O'Connor