**STATE OF ILLINOIS**

 **IN THE CIRCUIT COURT OF THE 18TH JUDICIAL CIRCUIT**

**COUNTY OF DU PAGE**

PEOPLE OF THE STATE OF ILLINOIS, )

PLAINTIFF, )

) CRIMINAL

VS ) No.

)

 )

DEFENDANT. )

 **MOTION FOR NEW TRIAL**

NOW COMES the defendant, , by his attorney, , pursuant to Illinois Compiled Statutes, Chapter 725, Section 5/116-1, and moves the Court for the entry of an order setting aside the verdict of the jury returned on , and granting a new trial for the following reasons:

1. That the verdict is contrary to the law and to the evidence.

2. That the State did not prove the guilt of the defendant beyond a reasonable doubt.

3. That the Court erred in denying defendant's motions for a directed verdict of not guilty at the close of the State's evidence, and at the close of all the evidence.

4. That the Court erred in refusing to give the following instruction to the jury, submitted by the defendant.

5. That the Court erred in giving the following instructions over defendant's objections.

6. That the Court erred when it permitted the prosecutor to ask numerous and continuous leading and suggestive questions of each of the State's witnesses over and above the objections made by the defendant's attorney, all to the prejudice of the defendant.

7. That the Court erred in denying the Motion to Dismiss the Information.

8. That the defendant was deprived of a fair trial by an impartial jury.

9. That the Court erred in admitting into evidence improper, irrelevant and incompetent evidence offered by the State over objections of the defendant.

10. That the verdict is the result of insufficient deliberation.

11. That the verdict is the result of the passion, bias and prejudice of the jury against the defendant.

12. That the Court erred when it sustained objections made by the prosecutors to questions asked by defendant's counsel.

13. The Court erred when it overruled objections made by defendant's counsel to questions asked by the prosecution.

Such other grounds and each and every error as may appear from the report of proceedings of the trial, which is not presently available to defendant or his counsel.

 , Defendant

By\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 , His Attorney