E-FILED 2017 NOV 07 12:02 PM LEE SOUTH - KEOKUK - CLERK OF DISTRICT COURT

IN THE IOWA DISTRICT COURT IN AND FOR SOUTH LEE COUNTY

STATE OF IOWA, Plaintiff vs. BENJAMIN G. TRANE, Defendant.	)))))))))	Cause No. **FECR009152** MOTION TO AUTHORIZE DEPOSITIONS AT STATE EXPENSE

COMES NOW, the defendant BENJAMIN G. TRANE, by and through his attorney, Lisa K. Schaefer, and hereby requests court approval to take depositions of the State's witnesses to be payable at State expense, and in support thereof, states as follows:

1. On September 18, 2017, the defendant was charged by way of trial information with Sexual Abuse – 3rd Degree, a Class C Felony; Sexual Exploitation by a Counselor, a Class D. Felony, and Child Endangerment, an aggravated misdemeanor.
2. The Minutes of Testimony filed with the Trial Information filed in this case contain at least eighteen (18) witnesses.
3. The defendant has filed his Notice of Intent to Conduct Depositions.
4. The defendant has been declared indigent by the Court, and the attorney for the defendant is court appointed.
5. All of the fees will be done so in good faith and for purposes of providing effective defense to the defendant.

Lisa K. Schaefer
AT0007704
706 Jefferson Street
Post Office Box 427
Burlington, Iowa 52601
Telephone 319-758-9800
Facsimile 319-758-9801
ATTORNEY FOR DEFENDANT