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IN THE HONORABLE SENATE OF THE STATE OF ILLINOIS  
FOR THE NINETY-SIXTH GENERAL ASSEMBLY  
SITTING AS AN IMPEACHMENT TRIBUNAL

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SECRETARY  
OF THE  
SENATE

In re )  
Impeachment of )  
Governor ROD R. BLAGOJEVICH )

**HOUSE PROSECUTOR'S  
MOTION FOR ADDITIONAL DOCUMENTS OR MATERIALS**


House Prosecutor David W. Ellis, pursuant to Senate Impeachment Rule 15(b)(2), moves for the admission of additional documents into evidence and, in support thereof, states as follows:

1. The House Prosecutor seeks to admit a document similar to a document included in Exhibit 6, namely the timeline detailing the events that transpired during the procurement of the flu vaccine, at the Impeachment Trial.
2. A copy of this document is attached to this Motion.
3. This document will be introduced during the live testimony of William Holland as a demonstrative exhibit.
4. This document is relevant and material because it demonstrates the Governor's action with regard to, and responsibility for, the procurement of flu vaccines as provided in paragraph 10 of the Article of Impeachment.
5. This document is not redundant because it does not exist in the proposed form and will be used for demonstrative purposes.
6. Moreover, although some evidence related to this issue is contained in the House impeachment record, under Senate Impeachment Rule 15(g), the evidence is not deemed redundant simply because it relates to material already in the record.

WHEREFORE, the House Prosecutor respectfully moves for the admission of the timeline detailing the events that transpired during the procurement of the flu vaccine at the Impeachment Trial.

Respectfully submitted,

**DAVID W. ELLIS,  
HOUSE PROSECUTOR**



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David W. Ellis  
House Prosecutor  
Illinois House of Representatives  
412 State House  
Springfield, IL 62706

