

**THIRD JUDICIAL DISTRICT - SALT LAKE COUNTY DISTRICT COURT  
SALT LAKE COUNTY, STATE OF UTAH**

**STATE OF UTAH**

**Plaintiff,**

**EMERGENCY MOTION  
TO WITHDRAW FALSE JURY INSTRUCTIONS**

v.

**PETER GOLUB,  
Defendant.**

**Case No: 235900706**

**Judge: ELIZABETH A. HRUBY-MILLS**

**Date: August 18, 2025**

**EMERGENCY MOTION TO WITHDRAW AND CORRECT JURY INSTRUCTIONS**

Defendant, appearing pro se, respectfully moves this Court for an order withdrawing Defendant's "Stipulated Jury Instructions" filed on August 14, 2025, and allowing substitution of corrected instructions.

**I. GROUNDS FOR WITHDRAWAL**

**1. Draft Work Product Inadvertently Filed**

Please accept my apology for accidentally uploading my "jury notes" instead of my "jury instructions." I've been working with a completely different document. But reviewing my filed documents August 18, 2025, I saw that I had filed my preliminary notes. The previously filed instructions contain draft language and work product that was inadvertently submitted without final review. When I prepare a motion, I first write the prosecution's arguments in order to better address them. The ungrammatical language, argumentative tone, and recapitulated harmful arguments clearly shows these were preliminary notes rather than final proposed instructions.

**2. Pro Se Status and Good Faith Error**

As a pro se defendant, Defendant respectfully acknowledges the filing error and seeks to correct it before the pretrial hearing to ensure efficient proceedings and proper jury guidance.

**II. TIMELINESS**

This motion is filed immediately upon recognition of the error and shared with the prosecution.

**WHEREFORE, Defendant respectfully requests that this Court:**

1. **GRANT** this Emergency Motion to Withdraw;
2. **STRIKE** the "Stipulated Jury Instructions" filed August 14, 2025;

3. **ACCEPT** the attached corrected jury instructions for consideration; and
4. **SCHEDULE** argument on the corrected instructions at pretrial hearing.

### **CERTIFICATE OF GOOD FAITH**

Defendant certifies this motion is made in good faith to correct a filing error and ensure proper jury instructions, not for purposes of delay or tactical advantage.

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2025, a true and correct copy of the foregoing was provided by email to:

**Steven Fredley, Deputy District Attorney**  
salzlakelegalnotices@slco.org

**Joseph Ciucci Liuzzi**  
josephcl@utcourts.gov  
Judicial Assistant for Judge Hruby-Mills  
**/s/ Peter Golub**

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**Defendant, Pro Se**  
**Date: August 18, 2025**