

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

Filed  
RECEIVED

04 JAN -9 AM 9:49

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA  
JSM

UNITED STATES OF AMERICA,

Case No. 8:03-CR-77-T-30TBM

v.

SAMEEH HAMMOUDEH,

Defendant

**MOTION TO TRANSPORT SAMMEEH HAMMOUDEH  
TO HILLSBOROUGH COUNTY**

COMES NOW the accused Sameeh Hammoudeh, by counsel and moves this honorable Court for the entry of an order requiring the transportation of Sameeh Hammoudeh to Hillsborough County *as soon as possible*. As grounds for the foregoing, counsel offers the following to wit:

1. The accused is currently confined at F.C.C. Coleman in the Special Housing Unit, a distance of approximately 75 miles, one way, from local counsel.
2. Any visit to Sameeh Hammoudeh regularly necessitates a 6 to 8 hour time commitment;
3. At present, the following 3 critical proceedings are scheduled in the pending matter against Sameeh Hammoudeh: Motion to Set Bail scheduled before the Honorable James S. Moody on January 20, 2004; Oral Arguments on Motions to Dismiss the Indictment before the Hon. James S. Moody, Jr., on January

FILED  
JSM  
04 JAN 12 PM 3:21

This motion/petition/stipulation has been duly considered and is hereby

SCANNED

*granted*

this 12 day of January 2004.

*Thomas B. McCoun III*

THOMAS B. McCOUN III  
United States Magistrate Judge

416

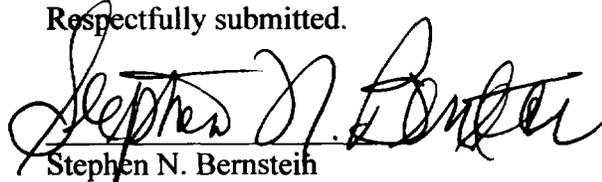
21, 2004 and a Discovery Conference before Magistrate McCoun on January 22, 2004.

4. The accused wishes to attend these material proceedings and confer with counsel during these proceedings.
5. Further, the accused has to complete his discovery review of the documents being maintained in the Federal District Courthouse, which review had been interrupted when Mr. Hammoudeh was transported back to USP Coleman.

**WHEREFORE**, the accused respectfully requests that Sameeh Hammoudeh transportation to Hillsborough County be ordered as soon as possible.

Dated: 8 January 2004

Respectfully submitted.



Stephen N. Bernstein  
Post Office Box 1642  
Gainesville, Florida 32602  
(352) 373-9555  
Florida Bar Number 145799  
Counsel for Defendant Hammoudeh

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion has been furnished to

Walter E. Furr, Esq.  
U.S. Attorney's Office  
Middle District of Florida  
400 North Tampa St., Suite 200  
Tampa, FL 33602

Daniel W. Eckhart, Esq.  
Office of the U.S. Attorney  
80 N. Hughey Avenue  
Suite 201  
Orlando, FL 32801

M. Allison Guagliardo, Esq.  
Federal Public Defender's Office  
Middle District of Florida  
400 N. Tampa St., Suite 2700  
Tampa, FL 33602

Bruce G. Howie, Esq.  
Piper, Ludin, Howie & Werner, P.A.  
5720 Central Ave.  
St. Petersburg, FL 33707

Donald E. Horrox, Esq.  
Federal Public Defender's Office  
Middle District of Florida  
400 N. Tampa St., Suite 2700  
Tampa, FL 33602

Linda G. Moreno, Esq.  
Law Office of Linda Moreno  
1718 E. 7<sup>th</sup> Avenue  
Suite 201  
Tampa, FL 33605

William B. Moffitt, Esq.  
Asbill Moffitt & Boss, Chtd.  
The Pacific House  
1615 New Hampshire Ave. N.W.  
Washington, DC 20009

by regular U.S. mail delivery on this \_\_\_\_\_ day of January 2004.

LAW OFFICES  
OF STEPHEN N. BERNSTEIN



STEPHEN N. BERNSTEIN

Post Office Box 1642  
Gainesville, Florida 32602  
Florida Bar Number 145799  
Counsel for Defendant Hammoudeh  
(352) 373-9555  
Facsimile (352) 373-5277

F I L E C O P Y

Date Printed: 01/13/2004

Notice sent to:

— Walter E. Furr, Esq.  
U.S. Attorney's Office  
Middle District of Florida  
400 N. Tampa St., Suite 3200  
Tampa, FL 33602

8:03-cr-00077 jlh

— Daniel W. Eckhart, Esq.  
Office of the U.S. Attorney  
80 N. Hughey Avenue, Suite 201  
Orlando, FL 32801

8:03-cr-00077 jlh

— Linda G. Moreno, Esq.  
Law Office of Linda Moreno  
1718 E. 7th Ave., Suite 201  
Tampa, FL 33605

8:03-cr-00077 jlh

— William B. Moffitt, Esq.  
Asbill Moffitt & Boss, Chtd.  
The Pacific House  
1615 New Hampshire Ave., N.W.  
Washington, DC 20009

8:03-cr-00077 jlh

— Stephen N. Bernstein, Esq.  
Stephen N. Bernstein, P.A.  
P.O. Box 1642  
Gainesville, FL 32602

8:03-cr-00077 jlh

— Bruce G. Howie, Esq.  
Piper, Ludin, Howie & Werner, P.A.  
5720 Central Ave.  
St. Petersburg, FL 33707

8:03-cr-00077 jlh

— M. Allison Guagliardo, Esq.  
Federal Public Defender's Office  
Middle District of Florida  
400 N. Tampa St., Suite 2700  
Tampa, FL 33602

8:03-cr-00077 jlh

— Kevin T. Beck, Esq.  
Federal Public Defender's Office  
Middle District of Florida  
400 N. Tampa St., Suite 2700  
Tampa, FL 33602

8:03-cr-00077 jlh

— Wadie E. Said, Esq.  
Federal Public Defender's Office  
Middle District of Florida  
400 N. Tampa St., Suite 2700  
Tampa, FL 33602

8:03-cr-00077 jlh