

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED
04 JAN 20 PM 3:54
CLERK
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

vs.

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

GHASSAN ZAYED BALLUT
_____ /

**DEFENDANT GHASSAN BALLUT'S MOTION TO ADOPT
DEFENDANT HATIM FARIZ'S MOTION TO COMPEL
PRODUCTION OF TRANSCRIPTS AND MEMORANDUM OF LAW**

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, requests this Honorable Court to permit the Defendant to adopt Defendant HATIM FARIZ's Motion to Compel Production of English-Language Transcripts and Memorandum of Law in Support dated January 8, 2004, the grounds set forth in the Motion and the accompanying Memorandum of Law, and all evidence adduced in support of the Motion, as if the same Motion were set out, filed, and produced by the Defendant, GHASSAN ZAYED BALLUT, but only to the extent that the Motion, the Memorandum of Law, or the evidence in support are beneficial and not adverse to the Defendant's interests. In support hereof, the Defendant would state:

1. HATIM FARIZ's Motion to Compel Production states that the Budget Subcommittee of the Administrative Office of the United States Courts has not approved expenditures for the translation and transcription of the wiretap conversations and foreign-language documents.
2. The Defendant's undersigned counsel, appointed pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A, therefore has reason to believe that a similar request by motion for costs relating to this translation and transcription would be denied or disapproved.
3. The Defendant has no other practical means to translate or transcribe these

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conversations and documents which are essential for the Defendant to prepare an adequate defense and ensure due process as guaranteed by the Fifth and Sixth Amendments of the United States Constitution.

4. The Defendant would also adopt the request for oral argument contained in the Motion to Compel Production.

5. The Defendant makes this request to permit the Defendant the benefit of HATIM FARIZ's Motion for Grand Jury Transcripts without burdening the record with unnecessary repetition and in the interests of judicial economy.

WHEREFORE, the Defendant requests this Honorable Court to permit the Defendant to adopt HATIM FARIZ's Motion to Compel Production of English-Language Transcripts and Memorandum of Law in Support, to allow oral argument on the Motion, and to grant the Defendant the same relief as requested in the Motion.

Respectfully submitted,



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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S.

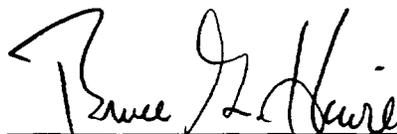
Mail or delivered by hand to the following this 20th day of January, 2004:

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