UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

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

GHASSAN ZAYED BALLUT
_____/

DEFENDANT GHASSAN BALLUT'S MOTION FOR EXTENSION OF TIME TO FILE MOTION TO DISMISS AND MEMORANDUM OF LAW

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, hereby requests this Honorable Court to extend the time permitted for the filing of motions to dismiss the Indictment or for bills of particulars by 120 days, and as grounds therefor would state:

1. In the Pretrial Discovery Order and Notice of Trial and Status Conference by this Court dated March 26, 2003, the Court granted 60 days from the date of the Order for the filing of motions to dismiss the Indictment or motions for a bill of particulars.

2. Because of the considerable amount of discovery in this case, of which the Court is well advised, and because of the complexity and novelty of the legal issues involved, the Defendant requires additional time in which to file any pretrial motions to dismiss or for bills of particulars.

3. Given the amount and pace of discovery and the complexity of the issues, the Defendant requires an additional 120 days beyond the current time limit to September 23, 2003.

WHEREFORE, the Defendant requests this Honorable Court to extend the time for the filing of pretrial motions to dismiss the Indictment and for bills of particulars 120 days to September 23, 2003.

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Memorandum of Law

Unless otherwise provided by local rule, the Court may, at the time of arraignment or as soon thereafter as practicable, set a time for the making of pretrial motions or requests and, if required, a later date of hearing. Fed. R. Crim. P. 12(c). The Court has discretion to direct the making of such motions. Fed. R. Crim. P. 12(b). In the present case, the Court granted the defendants 60 days from its Order of March 26, 2003, to file motions to dismiss, but in recognition of the extent and complexity of this case and the amount of time and preparation needed to bring this cause to trial, the Court has signaled that the Court would consider a substantial extension of the time for pretrial motions. Under the circumstances, the Defendant's undersigned counsel submits that an extension of 120 days to September 23, 2003, is reasonable and would not cause undue prejudice to the Government.

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 to the following this 23rd day of May, 2003:

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