

FILED

03 JUN -4 PM 2:37

COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

FILED

03 JUN -4 PM 2:37

UNITED STATES OF AMERICA

vs.

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

GHASSAN ZAYED BALLUT

**MOTION FOR PROTECTION OF DATES BY  
COUNSEL FOR DEFENDANT GHASSAN BALLUT**

The undersigned counsel for the Defendant, GHASSAN ZAYED BALLUT, hereby requests protection from the conduct of jury trial in this cause from Friday, June 13, to Tuesday, June 24, 2003, inclusive, and as grounds therefor states:

1. It is the knowledge and belief of the undersigned counsel that co-defendant SAMI AL-ARIAN has not waived his right to speedy trial and therefore the Government may be required to proceed to trial in his cause as early as the month of June, 2003.
2. It is further the knowledge and belief of the undersigned counsel that the Court would decline to sever the co-defendants in this cause for trial.
3. The undersigned counsel has made prepaid and non-refundable arrangements to travel out of state on vacation from Friday, June 13, to Tuesday, June 24, 2003, and proceeding to trial during those dates would cause substantial economic loss to the undersigned counsel.
4. Pursuant to 18 U.S.C. § 3161(h)(1), it is the knowledge and belief of the undersigned counsel that periods of delays resulting from any pretrial motions, including but not limited to the extension of the detention hearing, the pending appeal thereof, and motions to appoint co-counsel, to modify conditions of detention, and for extension of time, would be excluded from the

This motion/petition/stipulation has been duly considered and is hereby granted this 4 day of June, 2003.

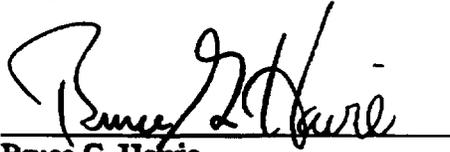
James S. Moody, Jr.  
JAMES S. MOODY, JR.  
U.S. DISTRICT JUDGE

#8  
151

computation of the time in which the trial must commence so that trial would not need to commence on or before June 24, 2003, to satisfy the speedy trial requirements of 18 U.S.C. § 3161(c)(1).

WHEREFORE, the Defendant's undersigned counsel requests protection from trial between June 13 and June 24, 2003, inclusive.

Respectfully submitted,



**Bruce G. Howie**  
**Piper, Ludin, Howie & Werner, P.A.**  
**5720 Central Avenue**  
**St. Petersburg, FL 33707**  
**Telephone (727) 344-1111**  
**Facsimile (727) 344-1117**  
**Florida Bar No. 263230**  
**Attorney for GHASSAN ZAYED BALLUT**

**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 7<sup>TH</sup> day of May, 2003:

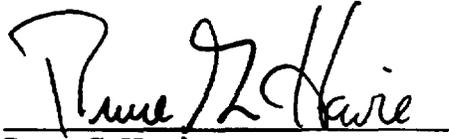
Walter E. Furr, III Esq.  
Office of the United States Attorney  
400 North Tampa Street, Suite 3200  
Tampa, FL 33602

Franklyn Louderback, Esq.  
Louderback & Helinger  
150 Second Avenue North, Suite 840  
St. Petersburg, FL 33701-3341

Donald E. Horrox, Esq.  
Office of the Federal Public Defender  
400 North Tampa Street, Suite 2700  
Tampa, FL 33602

Daniel M. Hernandez, Esq.  
902 North Armenia Avenue  
Tampa, FL 33609

Jeffrey G. Brown, Esq.  
777 Alderman Road  
Palm Harbor, FL 34683-2604



**Bruce G. Howie**  
Piper, Ludin, Howie & Werner, P.A.  
5720 Central Avenue  
St. Petersburg, FL 33707  
Telephone (727) 344-1111  
Facsimile (727) 344-1117  
Florida Bar No. 263230  
Attorney for GHASSAN ZAYED BALLUT

Date Printed: 06/04/2003

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

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