

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED

08 AUG -1 AM 9:09

UNITED STATES OF AMERICA

vs.

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

GHASSAN ZAYED BALLUT

DEFENDANT GHASSAN BALLUT'S MOTION FOR PERMISSION TO EXCEED THE MOTION PAGE LIMIT AND MEMORANDUM OF LAW

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The Defendant, GHASSAN BALLUT, by and through his undersigned counsel, pursuant to Local Rule 3.01(c), hereby requests this Honorable Court to permit the Defendant to file his Motion to Dismiss or Strike Counts One through Four, Nineteen, Thirty-Six through Thirty-Eight, and Forty through Forty-Two and Memorandum of Law at a page length in excess of the twenty-page length limit in Local Rule 3.01(c), and as grounds therefor states:

1. The Indictment filed in this cause is 120 pages in length, has fifty Counts, and contains allegations concerning events occurring over a period of approximately fourteen years, and the Defendant is obligated to respond to and discuss numerous allegations against him in order to present a complete and comprehensive argument in support of his multiple requests for relief.
2. The Defendant's Motion to Dismiss or Strike goes to all eleven Counts of the Indictment in which he is charged, and the Defendant cites and discusses multiple grounds in his Motion in support of his requests to dismiss or strike each of the eleven Counts.
3. The Defendant's undersigned counsel was unable to adequately present the Defendant's arguments and requests within the twenty-page limit of Local Rule 3.01(c).
4. The length of Defendant's Motion, including the Memorandum of Law, was necessary

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

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

SCANNED

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to satisfy the Defendant's right to due process for a proper determination of these issues.

5. The Defendant's Motion at 34 pages is of an appropriate length to fully inform the Court and the Government of the Defendant's grounds for relief.

WHEREFORE, the Defendant requests this Honorable Court to permit the Defendant to exceed the twenty-page limit in his Motion to Dismiss or Strike.

Memorandum of Law

Local Rule 3.01(c) prohibits the filing of a brief or legal memorandum in excess of twenty pages. However, Local Rule 3.01(c) also authorizes the Court to permit the filing of briefs and legal memoranda in excess of twenty pages. The Defendant's Motion to Dismiss or Strike at 34 pages is required to adequately address all issues that the Defendant is obligated to raise in support of his request for relief, and rather than causing any party prejudice or creating an undue burden on Court resources, the Defendant's Motion to Dismiss or Strike is of appropriate length to fully inform the Court and the Government of the Defendant's grounds for relief.

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.

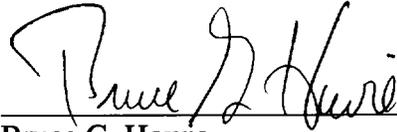
Mail to the following this 31st day of July, 2003:

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F I L E C O P Y

Date Printed: 08/04/2003

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8:03-cr-00077 jlh

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