

United States of America
Middle District of Florida
Tampa Division

United States of America

vs.

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

Sami Amin Al-Arian, et al.

Defendant Sami Amin Al-Arian Pro Se Motion
for a Ten-day Extension for His Pre-Trial Motions
and to Move to Hillsborough County Jail to Confer
with Legal Advisors and Review Discovery

Comes now the defendant, Sami Amin Al-Arian, in
a pro se capacity and moves this Honorable Court
to give him a ten-day extension for the submission
of his pre-trial motions, namely, the bill of particulars,
motion to dismiss the indictment, and the jury
questionnaire, after the current deadline of
September 5, 2003, i.e., until September 15, 2003,
for the following reasons:

- 1) The defendant has been unable to access the Law Library. He put out a request for the law library on 8/14/03. He was taken on 8/19/03 to work on his response to the Government's motion of August 12, 2003. He was pulled out before he was able to finish his work.

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- 2) The defendant has immediately submitted another request for the law library on August 19, 2003. As of September 1, 2003, that request has not been granted.
- 3) The defendant's legal advisors have twice been denied (within one week) access to the defendant. The defendant needs to confer with his legal advisors including a jury consultant before finalizing and submitting his jury questionnaire.
- 4) The delays in accessing the Law Library (primarily a handbook on motions such as the bill of particulars) as well as access to confer with the defendant's legal advisors are beyond the control of the defendant.
- 5) The Coleman prison's administration has not yet ceased (at least as of August 26, 2003) to open the defendant's legal mail outside his presence. Hence, the defendant has not been able to retrieve any work product that may have been available to him from his former court appointed attorney's until such unconstitutional practice is stopped.
- 6) The trial is still at least 16 months away, hence, a delay of 10 days should not precipitate any delays for the 2005 trial.
- 7) Furthermore, the defendant is requesting that the Court orders that he is brought to Tampa during the week of September 6, 2003, in order for him to prepare these pre-trial motions. The

defendant needs to be able to have continuous access to his legal advisors including a jury consultant. He needs to meet with them for an extended period of time which is beyond what is allowed at the Coleman penitentiary.

- 5) Moreover, the defendant requests the Court to allow the defendant during his extended stay to review for at least 15 days the financial records in the discovery files while in Tampa.

Wherefore, the defendant prays that the Court will give the defendant a ten-day extension until September 15, 2003, for his pre-trial motions, namely, the bill of particulars, the motion to dismiss the indictment, and the jury questionnaires.

Furthermore, the defendant asks the Honorable Court to order that he is brought to the Hillsborough County jail in order to facilitate daily consultations with his legal advisors including a jury consultant. During his stay in the County jail the defendant is requesting that he is allowed to review the financial records in the discovery files.

Respectfully Submitted

Sami O. Al-Arian

Date: September 1, 2003
Coleman Federal Prison

Sami A. Al-Arian

Certificate of Service

I hereby certify that a copy of the foregoing has been furnished by U.S. Mail to the office of the United States Attorney, Terry Furr, Assistant US Attorney, 400 N. Tampa St., Suite 3200, Tampa, FL 33602; Donald Horrox, Assistant Public Defender, 400 N. Tampa St., Suite 2700, Tampa, FL 33602; Daniel Hernandez, Esq., 902 N. Armenia Ave., Tampa, FL 33609; and Bruce Howie, Esq., 5720 Central Ave., St. Petersburg, FL 33707,
this 1st day of September, 2003.

Sami A. Al-Arian

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