

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO.: 8:03-CR-77-T-30-TBM

SAMI AMIN AL-ARIAN,
SAMEEH HAMMOUDEH,
GHASSAN ZAYED BALLUT,
HATIM NAJI FARIZ

**UNITED STATES' RESPONSE OF NO OBJECTION
TO MOTION FOR EXTENSION OF TIME FOR ALL
PLEADINGS FOR DEFENDANT SAMEEH HAMMOUDEH
AND UNITED STATES' MOTION TO STAY RESPONSE
DATE UNTIL ALL DEFENDANTS HAVE FILED PRE-TRIAL MOTIONS**

The United States has no objection to defendant Hammoudeh's Motion for Extension of Time to file Pre-Trial motions because of a change in counsel and the United States requests a stay for the United States' response date until all defendants have filed pre-trial motions and in support thereof states the following:

1. Recently the undersigned spoke with Daniel Hernandez, Esquire, who told the undersigned that Mr. Stephan Bernstein was being retained to represent defendant Hammoudeh. Mr. Hernandez stated that he had been requested not to file pre-trial motions because of the expected change in counsel.

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2. On September 9, 2003, the undersigned received the motion for extension of time for all pleadings for defendant Hammoudeh. The motion stated that Mr. Bernstein had been hired as counsel for defendant Hammoudeh and requested an extension of thirty (30) days for Hammoudeh to file pre-trial motions.

3. The United States believes Mr. Hammoudeh's motion is reasonable and therefore has no objection to an additional thirty (30 days) for Hammoudeh's pre-trial motions.

4. On August 23, 2003, pursuant to a previous extension for pre-trial motions for defendants Al-Arian and Fariz, the Court granted the United States' motion for a response date after all defense motions had been filed.

5. Recently, defendant Al-Arian was granted an extension until September 15, 2003 to file pre-trial motions. Doc. 243.

6. It continues to be the position of the United States that in the interest of judicial economy, the United States would like to respond to the various pre-trial motions after all the defendants have filed their motions. At this juncture, it is impossible for the United States to determine how much time will be needed to formulate responses and whether consolidated responses will be appropriate. the United States remains committed to addressing all pre-trial motions in an orderly, effective manner and as expeditiously as possible to ensure that judicial resources are used economically and efficiently.

WHEREFORE, the United States has no objection to defendant Hammoudeh's request for an additional thirty (30) days to file pre-trial motions and the United States requests that the Court stay the response date for the United States until all defendants have filed pre-trial motions.

Respectfully submitted,

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By:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by facsimile and U.S. mail this 10th day of September, 2003, to the following:

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