

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA,)	
)	Cause No. 6:17-cr-18-Orl-40KRS
)	
Plaintiff,)	
)	
vs.)	
)	
NOOR ZAHI SALMAN)	

Defendant.

MOTION REQUESTING LEAVE TO FILE
A MOTION IN EXCESS OF 25 PAGES

COME NOW Defendant, by and through undersigned counsel, and hereby respectfully move the Court for leave to file an over-length Motion to Suppress and Memorandum of Law in Support for the reasons set forth herein. The length of the proposed filing will not exceed thirty-five (35) pages, excluding caption and signatures.

MEMORANDUM OF LAW

Local Rule 3.01(d) states that

A motion requesting leave to file either a motion in excess of twenty-five (25) pages, a response in excess of twenty (20) pages, or a reply or further memorandum shall not exceed three (3) pages, shall specify the length of the proposed filing, and shall not include, as an attachment or otherwise, the proposed motion, response, reply, or other paper.

The Defendant presently has exceeded the amount of pages allowed by the Local Rules of this Court. She makes this Motion for additional pages in order to fully present all of the relevant facts and legal arguments relating to the necessity for the Court to

consider Defense request to suppress alleged statements made by the defendant, Noor Salman. Defendant has presented only the most relevant and compelling arguments, while not including frivolous arguments. It will benefit this Court in its decision making authority to be fully apprised of complete and thorough arguments in this matter so that justice may be served. The suppression issue is one of the major issues to be decided prior to trial, and the decision made by the Court will direct a large portion of the litigation strategy and trial preparation going forward.

These reasons support Defendant's request for excessive pages in this Motion to Suppress and accompanying Memorandum of Law, which shall not exceed thirty-five (35) pages long, along with accompanying Exhibits. Defendant has attempted diligently to stay within the page limit but the complexity of the issue, and the importance of the facts presented in the memorandum of law in connection to the events of the night surrounding the interrogation of the Defendant, necessitates an explanation in excess of the allotted 25 pages.

Counsel for Defendant Noor Salman has communicated with AUSA Sara Sweeney, and Ms. Sweeney is not in opposition to the Defense Motion for Over-Length Motion to Suppress with Memorandum in Support. Likewise, should the Government seek additional pages in any response, Defense will not object to their request for an over-length response.

WHEREFORE, for all of the reasons set forth above, Defendant respectfully requests that this Court grant its motion for leave to file an over-length motion to suppress with memorandum in support.

Dated: August 30, 2017

Respectfully submitted,

/s/ Charles D. Swift

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Motion to File an Over-length Motion to Suppress and Memorandum in Support was sent by CM/ECF delivery on August 30, 2017, to, all counsel or parties of record on the service list.

/s/ Charles D. Swift

Charles D. Swift
Pro Hac Attorney for Defendant Salman