

C. Gunning (1)
9-10-02 # 488
[81]

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
— Alexandria Division —

UNITED STATES OF AMERICA)
)
 y.) Criminal No. 01-455-A
)
 ZACARIAS MOUSSAOUT)

MOTION FOR ACCESS TO MATERIAL WITNESS. [REDACTED] AND FOR A
WRIT AD TESTIFICANDUM DIRECTING THE UNITED STATES TO PRODUCE
[REDACTED] FOR TESTIMONY AT TRIAL

COME NOW standby counsel, and pursuant to Fed. R. Crim. P. 16, *Brady v. Maryland*,
373 U.S. 83 (1963), 18 U.S.C. § 3500, and 18 U.S.C. § 3005, and the Fifth, Sixth and Eighth
Amendments to the United States Constitution, and for reasons set forth in the accompanying
memorandum hereby move this Court for an order requiring the United States to allow the
defense [REDACTED] pre-trial access [REDACTED] who is a material witness in this case,
[REDACTED] to whom access is
currently being denied. The defense also moves for a writ *ad testificandum* directing the United
States to produce [REDACTED] at trial so that he may be called as a witness.

Respectfully submitted,

STAND-BY COUNSEL

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