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

UNITED STATES OF AMERICA)	<u>UNDER SEAL</u>
)	
v.)	Crim. No. 01-455-A
)	Hon. Leonie M. Brinkema
ZACARIAS MOUSSAOUI)	

GOVERNMENT'S REQUEST TO POSTPONE CONSIDERATION OF
DEFENDANT'S REQUEST FOR ACCESS [REDACTED]

The United States respectfully requests that the Court postpone its consideration of defendant's [REDACTED] and standby counsel's [REDACTED] motions for access, [REDACTED]

As is explained in the attached *ex parte*, classified submissions, the situation with respect to [REDACTED] is in its infancy and national security concerns compel that situation to play out before the parties and the Court will have sufficient information to properly address the question of access [REDACTED]

[REDACTED] Accordingly, the United States requests that consideration of this issue be delayed for six months.

We recognize, of course, that such a delay likely necessitates the continuance of the trial and other hearings and pleadings in this case, and the United States does not object to such a continuance. We note that the defendant and his standby counsel have both moved for a continuance in the case for additional time for the defense to prepare. [REDACTED]

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request that the schedule for pleading and hearings, including hearings and pleadings deadlines under the Classified Information Protection Act, be vacated, with a revised calendar to be set later.

Respectfully Submitted,

Paul J. McNulty
United States Attorney

By:

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~~Robert A. Spencer~~
Kenneth M. Karas
David J. Novak
Assistant United States Attorneys

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CERTIFICATE OF SERVICE

I certify that on September 27, 2002, a copy of the foregoing Government's Request (without a copy of two *ex parte* submissions) was served on the Court Security Officer for transmission to the following standby counsel:

Frank Dunham, Jr., Esq.
Office of the Federal Public Defender
1650 King Street
Suite 500
Alexandria, Virginia 22314
Facsimile: (703) 600-0880

Gerald Zerkin, Esq.
Assistant Public Defender
One Capital Square, 11th Floor
830 East Main Street
Richmond, VA 23219
Facsimile: (804)648-5033

Alan H. Yamamoto, Esq.
108 N. Alfred St., 1st Floor
Alexandria, Va. 22314-3032
Facsimile: (703) 684-9700

Edward B. MacMahon, Jr., Esq.
107 East Washington Street
Middleburg, VA 20118

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Robert A. Spencer
Assistant U.S. Attorney