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~~TOP SECRET~~ [REDACTED]

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

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

GOVERNMENT'S STATUS REPORT CONCERNING  
DEFENDANT'S REQUEST FOR ACCESS [REDACTED]

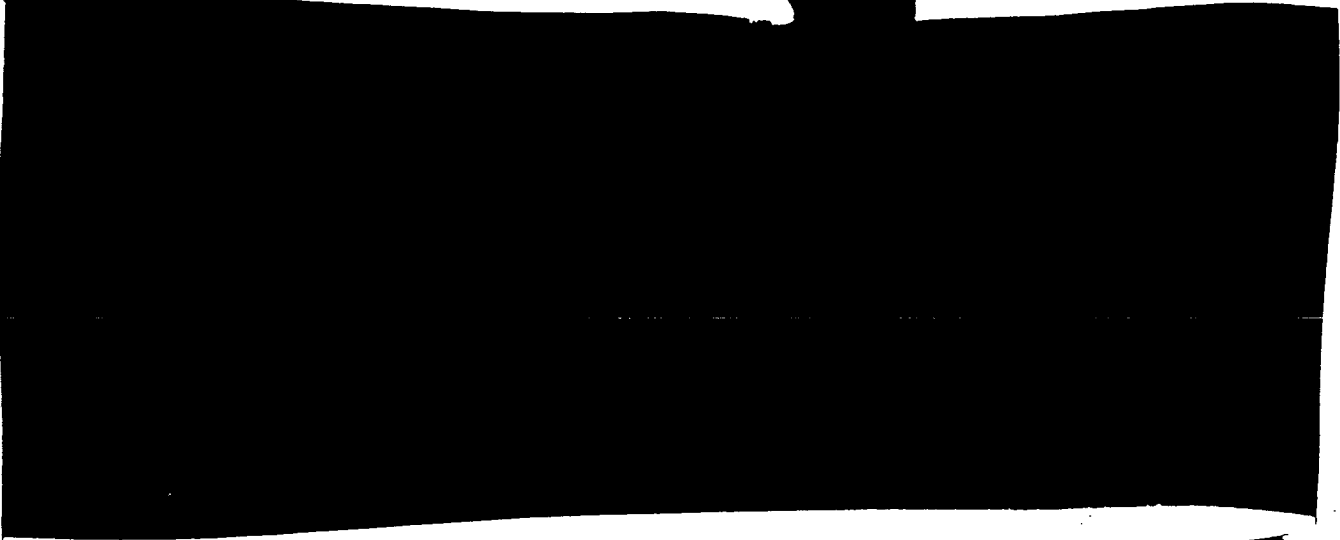
In accordance with the Court's orders to advise the Court of the status of [REDACTED]

[REDACTED] by December 2, 2002, the United States  
respectfully submits the attached classified, *ex parte* declaration regarding the status [REDACTED]

[REDACTED]  
the United States respectfully submits that the situation warrants postponing the Court's  
consideration of the defense motions for access for a further 45 days until January 16, 2003. As  
on October 2, 2002, and as is explained in the attached *ex parte*, classified declaration [REDACTED]

[REDACTED]

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Given that additional time is merited on the question of access [redacted] we ask that the same continuance be granted with respect to consideration of access [redacted]



With respect to [redacted] we believe that, in accordance with the Court's comments in the hearing on October 2, 2002, until the defense puts forth specific reasons necessitating defense access [redacted]

[redacted] as set forth in our pleadings filed October 1, 2002.<sup>1</sup> In sum, the situation [redacted] is unchanged in the last 60 days.

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<sup>1</sup> On Wednesday, November 27, 2002, at about 3:00 p.m., we were served with standby counsel's memorandum in support of their motion for access [redacted]. Their memo appears to contain very few specific reasons justifying defense access [redacted]. In any event, however, we respectfully request more time than the Thanksgiving holiday weekend to respond to this filing.

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Finally, with the trial date in this case now set for June 30, 2003, the Government's request to continue holding the defendant's requests for access in abeyance [REDACTED]

[REDACTED] is reasonable. There are significant national security interests at stake, and the additional time will not jeopardize the trial date.

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 December 2, 2002, a copy of the foregoing Government's Request (without a copy of an *ex parte* submission) was served on the Court Security Officer for delivery to standby defense counsel listed below:

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