

FILED

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

2003 MAR -6 P 4:30  
CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 ZACARIAS MOUSSAOUI )

UNDER SEAL  
Criminal No. 01-455-A

**MOTION TO PERMIT IBRAHIM ANDERSON TO ATTEND  
RULE 15 DEPOSITION OF EL HADI NDIAYE**

Comes now standby counsel and moves the Court for an order permitting Mr. Ibrahim Anderson to attend the Rule 15 deposition of El Hadi Ndiaye scheduled for March 11, 2003.

Mr. Ndiaye has expressed his anxiety and unease about traveling from Oklahoma to Virginia alone and has also indicated that he feels very intimidated by the federal court system and deposition procedure. Mr. Anderson is a friend of Mr. Ndiaye's and has acted as a sometimes interpreter for the Federal Defender in communications with Mr. Ndiaye. Mr. Anderson has offered to accompany Mr. Ndiaye and will provide his own expenses, including airfare, for this purpose. Mr. Anderson is amenable to being bound by any restrictions the Court might impose upon him to keep this matter confidential as it is under seal. Standby counsel respectfully request that Mr. Anderson be permitted to attend the Rule 15 deposition of Mr. Ndiaye scheduled for March 11, 2003.

Respectfully submitted,

STANDBY COUNSEL

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\_\_\_\_\_  
Frank W. Dunham, Jr.  
Federal Public Defender  
Gerald T. Zerkin  
Senior Assistant Federal Public Defender  
Kenneth P. Troccoli  
Anne M. Chapman  
Assistant Federal Public Defenders  
Eastern District of Virginia  
1650 King Street, Suite 500  
Alexandria, VA 22314  
(703) 600-0808

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\_\_\_\_\_  
Judy Clarke  
Federal Defenders of  
San Diego, Inc.  
255 Broadway, Suite 900  
San Diego, CA 92101  
(703) 600-0855

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\_\_\_\_\_  
Edward B. MacMahon, Jr.  
107 East Washington Street  
P.O. Box 903  
Middleburg, VA 20117  
(540) 687-3902

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\_\_\_\_\_  
Alan H. Yamamoto  
108 N. Alfred Street  
Alexandria, VA 22314  
(703) 684-4700

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion to Permit Ibrahim Anderson to Attend the Rule 15 deposition of El Hadi Ndiaye was served upon AUSA Robert A. Spencer, AUSA David Novak and AUSA Kenneth Karas, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, Virginia 22314, by placing a copy by hand in the box designated for the United States Attorney's Office in the Clerk's Office of the U.S. District Court for the Eastern District of Virginia, El Hadi Ndiaye, 1429 Jami Drive, Norman, Oklahoma 73071 and, UPON APPROVAL FROM THE COURT SECURITY OFFICER, via first class mail to Zacarias Moussaoui, c/o Alexandria Detention Center, 2001 Mill Road, Alexandria, Virginia 22314 this 18 day of March 2003.

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Anne M. Chapman