

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

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 01-455-A
)	Hon. Leonie M. Brinkema
ZACARIAS MOUSSAOUI,)	
a/k/a "Shaqil,")	
a/k/a "Abu Khalid al Sahrawi,")	
)	
Defendant)	

GOVERNMENT'S UNOPPOSED MOTION TO
EXTEND DEADLINE FOR EXPERT WITNESS NOTICE

With the agreement of defense counsel, the United States respectfully requests the Court to extend the deadline for the Government's notice of its expert witnesses. Currently, the Government must file its notice of its expert witnesses on December 23, 2005. The Government, however, has tendered many proposed stipulations, which defense counsel is reviewing, that may eliminate the need for the Government to call some experts. Instead, the Government may call summary witnesses – the number and identity of whom will be determined by the stipulations to which the defense agrees. See United States v. Janati, 374 F.3d 263, 272-75 (4th Cir. 2004) (endorsing the use of summary charts and witnesses in complex, health-care fraud case). For this reason, the Government respectfully requests that it be allowed to file its expert witness notice on January 9, 2006. At the same time, the Government will also identify for the defense the summary witnesses that it intends to call. The defense will then file their notice on January 24, 2005. This motion does not apply to any mental health experts that the parties may call due to

CERTIFICATE OF SERVICE

I certify that on the 9th day of December, 2005, copies of the foregoing

Government pleading was served, by facsimile and regular mail, on the following counsel:

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