

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

V

Case No.: 10-20458

Hon.: Nancy G. Edmunds

NITHAL AOUN, D-1, MOHAMAD
AOUN, D-2, WISSAM AOUN, D-3,
HASSAN AOUN, D-4, GHASSAN
AOUN, D-5, JOHN TAYLOR, D-6,
ALI HASSOUN, D-7, CARLOS EVANS,
D-8

Defendants.

NOTICE OF HEARING

TO: Cynthia Oberg
Assistant U.S. Attorney
211 W. Fort St., Ste. 2001
Detroit, MI 48226

PLEASE TAKE NOTICE that the Defendant's attached Motion shall be heard on a date and time set by the Case Manager for Judge Nancy G. Edmunds.

Respectfully submitted,

By: /s/ Sidney Kraizman
Sidney Kraizman P16199)
Attorney for Defendant
615 Griswold, 1616 Ford Building
Detroit, Michigan 48226
(313) 961-7078
sidkraizman@sbcglobal.net

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Defendants.

MOTION TO EXTEND THE MOTION CUTOFF DATE AND COMBINED BRIEF

Now comes the Defendant Carlos Evans, by and through his attorney Sidney Kraizman, and moves to extend the motion cutoff date to September 27, 2011 for the following reasons:

1. The Defendant Carlos Evans is charged in the Indictment with Conspiracy to Commit Federal Crimes (Count 1) and Trafficking in Counterfeit Goods, Aiding and Abetting (Count 23).

2. The discovery in this case consists of 28 discs containing voluminous documents and recorded conversations. After reviewing the discovery discs, it appears to present counsel that a number of documents are missing from the discs as to the Title III wiretaps. Present counsel has this date filed a motion for discovery seeking those documents. After receiving those documents as to the Title III wiretaps, present counsel must review complex issues as to the Title III wire taps that resulted in the interception of scores of telephone conversations in this case.

3. Present counsel, Sidney Kraizman, needs an extension to September 27, 2011 to obtain these documents and research the Title III wiretap legal issues involved in this case.

4. This requested extension of the motion cutoff date is necessary to provide the Defendant Carlos Evans with his right to effective assistance of counsel and to the Due Process of Law under the Constitution of the United States Constitution.

Wherefore, the Defendant Carlos Evans, by his attorney Sidney Kraizman, respectfully requests that this honorable court extend the motion cutoff date September 27, 2011.

Respectfully submitted,
/s/ Sidney Kraizman
Sidney Kraizman (P16199)
Attorney for Defendant
615 Griswold, 1616 Ford Building
Detroit, Michigan 48226
(313) 961-7078
sidkraizman@sbcglobal.net

Dated: August 12, 2011

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

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Case No.: 10-20458

Hon.: Nancy G. Edmunds

NITHAL AOUN, D-1, MOHAMAD
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Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2011 , I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to all defense counsel of record and to the following:

AUSA Cynthia Oberg
Assistant U.S. Attorney
211 W. Fort St., Ste. 2100
Detroit, Michigan 48226

this date: August 12, 2011 .

/s/ Sidney Kraizman
Signature