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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) No. CR 03-95-WBS
15)
16 Plaintiff,) DEFENDANT AMR MOHSEN'S MOTION TO
17 v.) CONTINUE AND TO CONSOLIDATE THE
18) POST-TRIAL MOTION HEARING WITH
19 AMR MOHSEN and ALY MOHSEN,) SENTENCING ON OCTOBER 20, 2006
20) AND PROPOSED ORDER
21) [No Hearing Requested]
22)
23) Hon. William B. Shubb
24)
25)
26)

27 Defendant AMR MOHSEN, through his attorneys Bruce Locke and John
28 Balazs, moves the Court to continue and consolidate the post-trial
motion hearing set for September 15, 2006, with the sentencing hearing
set for October 20, 2006, at 10:00 a.m. The government opposes this
request and wants the post-trial motion hearing to be held before
sentencing.

Defense counsel so requests because he believes it will be more
efficient to handle both post-trial motions and sentencing in a single

1 hearing in San Francisco on October 20, 2006. Further, undersigned
2 counsel starts a 2-3 week trial on September 5, 2006, in federal court
3 in Sacramento in United States v. Luong, No. 96-350-WBS, and has a
4 trial scheduled for September 12, 2006, in Sacramento Superior Court in
5 People v. Saechao, No. 06F02268, which is set to trail and begin after
6 the Luong trial. Although neither trial will be in session on
7 September 15, 2006, counsel desires to use that day to prepare for
8 these trials. Finally, undersigned counsel researched and drafted the
9 vast majority of the Rule 29 motion briefs in this case and has
10 previously prepared to argue the motions for a prior hearing. Thus,
11 counsel does not believe it would be wise to hand off argument of the
12 motion to Mr. Mohsen's other counsel, Bruce Locke.

13 For all these reasons, Mr. Mohsen requests that the September 15,
14 2006 post-trial motions hearing be continued to and consolidated with
15 the sentencing hearing on October 20, 2006. He does not requests a
16 hearing on this motion.

17 DATED: September 5, 2006

18 Respectfully submitted,

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21 JOHN BALAZS
22 Attorney for Defendant
23 AMR MOHSEN
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ORDER

IT IS HEREBY ORDERED that defendant Mohsen's motion to continue and consolidate the post-trial motions hearing with the sentencing hearing on October 20, 2006, at 10:00 a.m. is hereby GRANTED/DENIED.

Dated: September _____, 2006

Hon. William B. Shubb
U.S. District Judge