

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Case No. 22CR392 (DLF)
	)	
ABU AGILA MOHAMMAD	)	
MAS'UD KHEIR AL-MARIAMI,	)	
Defendant.	)	

**DEFENDANT'S MOTION TO CONTINUE FILING DEADLINES AND  
JOINT MOTION FOR STATUS HEARING**

COMES NOW the defendant, by counsel, Laura Koenig, Whitney E.C. Minter, and Brooke Sealy Rupert, Assistant Federal Public Defenders, and moves this Honorable Court to continue the current filing deadlines for defendant's reply to the government's opposition to his motion to suppress and his notice of expert witnesses to be called in his case-in-chief. The government takes no position as to the filing deadlines.

Further, the parties jointly request that this Court schedule a status hearing, to further address any scheduling issues. In support of this Motion, defendant states as follows:

1. Defense counsel is cognizant of the Court's September 15 minute order noting that the Court was disinclined to grant any further continuances of filing deadlines. However, as noted in a previous filing, an attorney on the defense team – who has represented Mr. Al-Marimi since the inception of this case – recently became aware of a

conflict that required him to withdraw from the case.

2. In response, the Office of the Federal Public Defender has assigned two additional attorneys to represent Mr. Al-Marimi, but these attorneys have not previously been involved in the case. New counsel have been working diligently to become familiar with the facts of the case and the pending legal issues. Despite their efforts, however, it is not possible for Mr. Al-Marimi's attorneys to be sufficiently versed in the case, given the numerous filing deadlines in the coming weeks and the voluminous discovery in this matter.
3. This Court's June 27 scheduling order [ECF 117] requires that notices of expert testimony for the parties' cases-in-chief be filed by October 8, 2025. The defense seeks a 45-day continuance of this filing deadline.
4. Further, this Court's September 2 minute order requires that the defendant's reply regarding his motion to suppress statements be filed by October 7, 2025. The defense seeks a 3-day continuance of this filing deadline.<sup>1</sup>
5. Undersigned counsel has conferred with the government, and the government takes no position on continuing the deadlines.
6. Accordingly, counsel for Mr. Al-Marimi seeks the above continuances in order to submit comprehensive pleadings which satisfy counsel's

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<sup>1</sup> The defense previously sought a brief continuance of the filing deadlines for the motion to suppress based on an unrelated personal situation of one defense counsel, however, at that time, the current conflict had not yet arisen.

ethical obligations to provide zealous representation.

7. Additionally, the parties would request a status hearing so counsel can fully advise the Court about the pending scheduling complications. The parties will file a status update on or before October 3, 2025, to further outline the challenges that counsel are facing and identify issues where the parties seek clarification from the Court.

8. Proposed orders are attached.

For all of the foregoing reasons, the defendant respectfully requests that the Court order that, no later than October 10, 2025, the defendant file any reply to the government's opposition to his motion to suppress and that, no later than November 25, 2025, the defendant shall file notice of any experts he reasonably expects to call in his case-in-chief.

Further, the parties respectfully request that this Court schedule a status hearing.

Respectfully submitted  
By Counsel,  
Jeremy C. Kamens,  
Federal Public Defender

By: \_\_\_\_\_/s/\_\_\_\_\_  
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