

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	Case No. 22-cr-392 (DLF)
v.	:	
	:	
ABU AGILA MOHAMMAD	:	
MAS'UD KHEIR AL-MARIMI	:	
	:	
	:	
Defendant.	:	

UNOPPOSED MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully request that the Court exclude time under the Speedy Trial Act through the trial date of August 24, 2026. In support of this motion, the government states as follows:

On September 1, 2025, the Court excluded time under the Speedy Trial Act through April 20, 2026, finding that, "given the complex nature of the case, the amount of time required to adequately prepare for pretrial proceedings and for trial, see 18 U.S.C. 3161(h)(7)(B)(ii), the voluminous discovery, including evidence located in other countries, id. 3161(h)(8), and the need for the defense to determine how best to defend this case, see id. 3161(h)(7)(B)(iv) -- the Court finds that the "ends of justice outweigh the best interest of the public and the defendant in a speedy trial." 18 U.S.C. 3161(h)(7)(A). Minute Order dated September 1, 2025.

The nature of the case remains complex, including voluminous discovery and evidence located in other countries, for reasons previously described. Additionally, the government has continued to provide discovery and, as the Court knows, there is ongoing complex litigation in the case scheduled between now and trial. Additionally, since the last order excluding time under the

Speedy Trial Act, one defense counsel has withdrawn from the case, and two others were added to the case.

Government counsel have conferred with defense counsel, and defense counsel have indicated that the defense does not oppose this request. Additionally, the defense counsel have represented that they have spoken to the defendant, who consents to the request to exclude time through trial.

Accordingly, the government requests that the Court continue to exclude time under the Speedy Trial Act through August 24, 2026, because the ends of justice outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. 3161(h)(7)(A).

WHEREFORE, for the foregoing reasons, and any additional reasons as may be cited at a hearing on this motion, the government requests that this motion be GRANTED, and that the Court sign the attached proposed order.

Respectfully submitted,

JEANINE FERRIS PIRRO
UNITED STATES ATTORNEY

/s/ Erik M. Kenerson

ERIK M. KENERSON (OH Bar No. 82960)
BRITTANY KEIL (D.C. Bar No. 500054)
CONOR MULROE (NY Bar Number 5289640)
Assistant United States Attorneys
JEROME J. TERESINSKI (PA Bar No. 66235)
Special Assistant United States Attorney
National Security Section
United States Attorney's Office
601 D Street NW
Washington, D.C. 20530
(202) 252-7201
Erik.Kenerson@usdoj.gov

KATHLEEN CAMPBELL (MD Bar No. 9812170031)
JENNIFER BURKE (MD Bar No. 9706250061)
Trial Attorneys
Counter Terrorism Section
National Security Division
950 Pennsylvania Avenue NW
Washington, D.C. 20530