

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 2: 13-cr-20772

Plaintiff,

HONORABLE PAUL D. BORMAN

-vs.-

VIO: 18 U.S.C. § 1425(a)

D-1 RASMIEH YOUSEF ODEH,
a/k/a Rasmieh J. Odeh,
a/k/a Rasmieh Joseph Steve,
a/k/a Rasmieh Youssuf Odeh,
a/k/a Rasmieh Yusef Odeh

Defendant.

GOVERNMENT'S REQUEST FOR
RECIPROCAL DISCOVERY

The United States of America, by and through its attorneys, Barbara L. McQuade, United States Attorney, Jonathan Tukel and Mark Jebson, Assistant United States Attorneys, hereby requests disclosure of evidence by the defendant, Rasmieh Yousef Odeh, pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure, the defendant having requested and received disclosure of evidence by the government pursuant to Federal Rules of Criminal Procedure 16(a)(1)(A)-16(a)(1)(B) and 16(a)(1)(D)-16(a)(1)(G).

Specifically, pursuant to Fed. R. Crim. P. 16(b)(1)(A), the government hereby requests to copy and inspect or photograph all books, papers, documents, data, photographs, tangible objects, buildings or places, or copies or portions thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce in her case-in-chief at trial, the defendant having requested disclosure under Fed. R. Crim. P. 16(a)(1)(E).

Pursuant to Fed. R. Crim. P. 16(b)(1)(B), the government also requests to copy and inspect

any results, reports, or copies thereof, of physical or mental examinations and of scientific tests or experiments made in connection with the instant case which are within the defendant's possession or control, and which she intends to use in her case-in-chief at trial, or which were prepared by a witness whom she intends to call at the trial when the results or reports relate to that witness's testimony, the defendant having requested disclosure under Fed. R. Crim. P. 16(a)(1)(F).

Pursuant to Fed. R. Crim. P. 16(b)(1)(C), the government also requests notice of any testimony which the defendant intends to use under Federal Rules of evidence 702, 703, or 705, the defendant having requested such disclosure by the government under Fed. R. Crim. P. 16(a)(1)(G). Such notice by the defendant must describe each such witness's opinions, the bases and reasons for those opinions, and each such witness's qualifications.

Pursuant to Fed. R. Crim. P. 16(c), the government's requests, and the defendant's duty to disclose, shall be continuing in nature.

Respectfully submitted,

BARBARA L. McQUADE
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s/ Jonathan Tukel
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Dated: November 27, 2013

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2013, I electronically filed the foregoing document with the Clerk of the Court using ECF System which will send notification of such filing to William W. Swor.

s/ Jonathan Tukel
JONATHAN TUKEL
Assistant United States Attorney