

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**Case No. 13-20772
Hon. Gershwin Drain**

RASMIEH YUSEF ODEH,

Defendant.

**MOTION FOR PRODUCTION AND DISCOVERY PURSUANT RULE 16
FEDERAL RULES OF CRIMINAL PROCEDURE AND STANDING
ORDER OF EASTERN DISTRICT OF MICHIGAN.**

Now Comes, the defendant, Rasmae Odeh, by her undersigned counsel and requests that this Court issue an Order requiring the government comply with Rule 16, F.R. Crim. Pro., and the Standing Discovery Order of the Eastern District of Michigan and produce the following under the original and superseding indictment of the above-entitled case.

1. Any information within the meaning of the "Standing Order" paragraph 1(a) and/or Rule 16 (a) (1) of the Federal Rules of Criminal Procedure, including but not limited to all written or recorded statements, or oral statements reduced to writing including grand jury testimony, or testimony in Israel before the military tribunal or to Israeli police or

security officials; the names of each Israeli official who witnessed such statements and the dates of such statements.

2. A written summary of the expert testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during their case in chief at trial, including the curriculum vitae of each witness and the names of prior cases in which each expert was qualified and testified as an expert. The summary must describe the witnesses opinions, the bases and reasons therefore and the witnesses qualifications.
3. Any exculpatory evidence within the meaning of “Standing Order” 1(b) and/or *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny.
4. Any statement of witnesses within the meaning of 18 U.S.C. Sec. 3500 (e) and any statement by persons who have possible knowledge or information pertinent to the allegations in the indictment or superseding indictment which are not protected from disclosure under 18 U.S.C. 3500.
5. All books, papers, documents, photographs and tangible objects that are in the possession or control of the government and are intended to be used in the government’s case-in-chief at trial.

6. All documents in possession or control of the government which are material to the preparation of the defense, or were obtained from or belong to the defendant.
7. Results or reports of any physical or mental examinations, or scientific tests or experiments, that are within the possession or control of the government, and are intended to be used as evidence in the government's case-in-chief or are material to the preparation of the defense.
8. Any 404(b) evidence the government intends to offer at trial.
9. Pursuant to the "Standing Order" paragraph 5(b) that the foundation for all exhibits will be contested, and pursuant to 6, the chain of custody of any and all exhibits will also be contested.
10. Notice is also given that pursuant to "Standing Order" paragraph 7, any scientific testimony or summary testimony by experts will be contested unless it fully complies with the Federal Rules of Evidence.
11. All the above requests are continuing and the prosecution is expected to provide any additional information, materials or evidence as required by the "Standing Order" and Rule 16 (3) of the Federal Rules of criminal Procedure.

Dated: February 14, 2017

Respectfully submitted

/s/ Michael E. Deutsch

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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2017, I electronically filed or caused to be filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF filers.

/s/ Michael E. Deutsch
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Dated: February 14, 2017