

**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 CONTINUANCE OF TRIAL DATE AND TO VACATE
DATES TO FILE MOTIONS, JURY INSTRUCTIONS AND VOIR DIRE**

NOW COMES Rasmea Odeh, by her undersigned counsel, and respectfully moves for a continuance of the trial date presently set for January 10, 2017, to nay date after March 15, 2017. In support of this motion Ms. Odeh states the following:

1. Counsel was just informed that the government has obtained an 18 page superseding indictment against Ms, Odeh adding additional allegations and charges.
2. Counsel will need time to study the indictment, investigate and research the claims made therein and explore possible motions and defenses, as well as arrange for out of state witnesses schedules to be present at a new trial.

3. Counsel has been making concentrated efforts to comply with the Court's prior Orders, including filing all pre-trial motions by tomorrow, December 14, 2016.
4. The prosecution through AUSA Jonathan Tuckel, has notified counsel that it will not object to a reasonable continuance of the trial date.

WHEREFORE, Ms. Odeh by her undersigned counsel respectfully requests that the trial date of the superseding indictment be continued to any date after March 15, 2017 and that all dates presently scheduled for motions etc, be vacated and reset at a later time.

Respectfully submitted,

Dated: December 13, 2016

/s/ Michael E. Deutsch
Michael E Deutsch
1180 N. Milwaukee Ave.
Chicago, Ill. 60642 773-235-0070

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2016, 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
People's Law Office
1180 N. Milwaukee Ave.
Chicago, IL 60642
773-235-0070

Dated: December 13, 2016