

motion and asked that the defense represent that “the government's position is that the defendant should be detained pre-trial, but that in light of the Court's past rulings on this subject, it leaves the decision on the motion to modify the conditions of release to the discretion of the Court. Further, it is the government's position that this motion highlights the need for a prompt resolution of the outstanding substantive motions in this case.”

6. Dr. Al-Arian has never violated any conditions set by the Court.

7. This Court should modify Dr. Al-Arian’s conditions of release to move his residence, because of the limited nature of the proposed modification, the lack of any danger to other persons or the community posed by the requested modification, and the pre-trial services officer’s lack of objection to the proposed modification.

A proposed order is attached.

Respectfully submitted,

Dr. Sami Amin Al-Arian
By Counsel

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Dated: December 20, 2013

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of December, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Mr. Gordon Kromberg, Esq.
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Attorney for the United States

I will also be sending via first-class mail, the under seal filing referenced herein to:

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