

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CRIM. NO. 15-CR-49(MJD/FLN)

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UNITED STATES OF AMERICA,

Plaintiff,

v.

**DEFENDANTS' JOINT MOTION  
FOR DISCLOSURE OF RULE  
16(a)(1)(G) MATERIALS**

HAMZA NAJ AHMED (1),  
ADNAN ABDIHAMID FARAH (3),  
ABDURAHMAN YASIN DAUD (4),  
ZACHARIA YUSUF ABDURAHMAN (5),  
HANAD MUSTOFE MUSSE (6),  
GULED ALI OMAR (7),

Defendants.

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Defendants Hamza Naj Ahmed, Adnan Abdihamid Farah, Abdurahman Yasin Daud, Zacharia Yusuf Abdurahman, Hanad Mustofe Musse and Guled Ali Omar, by and through their undersigned counsel, hereby move the Court for an Order directing the Government to disclose expert witness information, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure.

The Court-Ordered discovery should include the following:

1. A written summary of all testimony the government intends to introduce under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial;
2. A description of the witness' opinions, including the bases and reasons therefore; and

3. A record of the witness' qualifications.

As is the practice with the other disclosures required by Rule 16, we request that the production of this information be ordered to take place forthwith.

Respectfully submitted,

Dated: August 6, 2015

GASKINS, BENNETT, BIRRELL, SCHUPP,  
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