

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA            )  
  )  
                  v.                    )     CRIMINAL NO. 02-10013-WGY  
  )  
RICHARD C. REID                    )

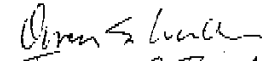
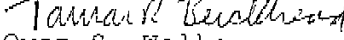
DEFENDANT'S REQUEST FOR RULE 11 HEARING AND  
REQUEST FOR RULING ON  
MOTION TO STRIKE SURPLUSAGE FROM INDICTMENT

Defendant, Richard C. Reid, respectfully moves the court to schedule a hearing pursuant to Fed.R.Crim.P. 11, as he intends to plead guilty to all surviving counts of the indictment, namely Counts One through Eight.

The defendant requests that at the Rule 11 hearing, before he offers his guilty plea, the court hear and rule upon defendant's Motion to Strike Surplusage from Indictment, filed July 8, 2002 (requesting that the court strike the two identical paragraphs 1 and 2 in Counts One and Two alleging that defendant received training from Al Qaeda, a designated foreign terrorist organization). It is defendant's intent to admit the facts constituting the elements of the offenses charged in those counts, namely, attempted use on December 22, 2001 of weapon of mass destruction against one or more United States nationals while such nationals were outside the United States (Count One, paragraph 3) and attempted murder on December 22, 2001 of one or more such United States nationals (Count Two, paragraph 3). It was not the government's intent, as conveyed to counsel, to

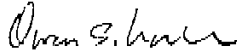
present evidence at trial on the allegations in paragraphs 1 and  
2 of Counts One and Two.

RICHARD C. REID  
By his attorneys,

  
  
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CERTIFICATE OF SERVICE

I, Owen S. Walker, hereby certify that a true copy of the  
above document was served upon Assistant United States Attorneys  
Gerard T. Leone, Jr., Timothy Q. Feeley, and Colin Owyang by  
delivery on October 2, 2002.

  
Owen S. Walker