

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

CASE NO. 3:19-cr-00192-HES-JRK

UNITED STATES OF AMERICA,

Plaintiff,

v.

GE SONGTAO,

Defendant.

//

**DEFENDANT GE SONGTAO'S REQUEST FOR ORAL ARGUMENT
AND FOR AN EVIDENTIARY HEARING**

COMES NOW, defendant, Ge Songtao ("Mr. Ge"), by and through undersigned counsel, and pursuant to Local Rule 3.01(j), respectfully requests this Court to entertain oral argument and an evidentiary hearing on Mr. Ge's Emergency Motion to Reopen Pretrial Detention Hearing or for the Temporary Release of Defendant Ge Songtao and Incorporated Memorandum Of Law (D.E. 121), and, in support thereof, states as follows:

Though to Mr. Ge and his counsel, the facts surrounding his risk from the coronavirus resulting from his detention are clear and compelling, we recognize that the Court may well need an evidentiary basis to consider his motion. Moreover, many of the facts of Mr. Ge's conditions of confinement are unknown. Mr. Ge, therefore, believes that oral argument and an evidentiary hearing, are necessary to better assist this Court in understanding the factual and legal issues related to the his arguments in the pending emergency motion.

Undersigned counsel, not certain how long an evidentiary hearing will take, estimate the time required for oral argument will be approximately two hours. Pursuant to Local Rule 3.01(i), given the Coronavirus Pandemic and limited travel options, and given that counselors are located in different cities and are presently self-isolating, counsel requests the hearing be telephonic or by video-conferencing using FaceTime or Skype.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Counsel for Mr. Songtao has conferred with Michael Coolican, Assistant United States Attorney, with respect to this motion. The Government opposes the motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 19th day of March, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in another authorized manner for those counsel or parties not authorized to receive electronically Notices of Electronic Filing.

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/s/ Edward R. Shohat

EDWARD R. SHOCHAT