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Attorney Work Product

**Subject: Defense Discovery Requests**

Copied below are the flight related discovery requests set out in a letter from defense counsel of February 25, 2002. These requests relate primarily to evidence about the four hijacked flights (numbers 1-11) and the activities of the defendant and the 19 dead hijackers (number 12).

Defense requests:

For each of the four flights referenced in the Indictment, the defense is requesting the following:

NTSB  
AT

1. Cockpit Flight Data Recorder - transcript, audio recording, make, model and serial number and a sound spectrum study.

NTSB  
AT

2. Digital Flight Data Recording - transcript, digital recording and make, model and serial number of data recorder.

AT

3. FAA Air Route Traffic Control Center/Approach Control/Departure Control

- \*ATC Package
- \*Flight Plan Route
- \*Clearance Delivery Recording
- \*Ground Taxi Recording
- \*Tower Recording
- \*Flight Path Transponder Readings

AT  
ACS?

4. Telephone and Data Transmissions - transcripts and/or voice recordings of any calls made or received by any passenger on any of the hijacked planes. This request also seeks the calls made or received by the Flight Phone *RECORDED AND FILE*

ACS?

5. Official passenger manifest by name, seat number, age, sex and place of residency.

ACS?

6. Official Crew list with identities of the crew by name, age, place of residence, seat location and assigned duties.

AI

7. Wreckage - detailed inventory of all items found in the wreckage including passenger baggage, carry-on items, purses, briefcases, bags or other containers.

- \*Detailed descriptive inventory with serial numbers, if possible, of all crew carry on radio transmitters/receivers, GPS transmitters/receivers, stereo radio, tape players, portable electronic devices and/or laptop computers.
- \*Description of any weapons found.
- \*Drawing or schematic of wreckage distribution.

AI

8. Reports - Any crash investigation reports, police reports or other analysis of the crash scenes.

AT

9. Witness Statements of Air Traffic Controllers, Flight Service Station Controllers, dispatchers, and/or maintenance personnel.

10. Reservations on each hijacked flight:

- \*Name, age, address, frequent flyer number, seat number.
- \*Date and time reservations were made for Flight 93.
- \*Identity of all reservations made, canceled or failed to show.

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- \*Audio recording of reservations.
- \*Transcript recordings of reservations.

11. Security Screening:

ACS

- \*Procedure manual for screening passengers at airline departure point.
- \*Still & video photography from screening area at departure airport on September 11, 2001.
- \*Still & video photography from ticket area at departure airport on September 11, 2001.

12. With regard to all alleged conspirators and Mr. Moussaoui:

- \*Reservations by names, alias, address, frequent flyer number, seat assignment to include all seat reservations made, made & canceled and made but failed to show on any U.S. or foreign air carrier for the previous 36 months.
- \*Still & video photography from ticket area, screening area, boarding or airport environment, curtilage or perimeter at any airport and on any date.
- \*Driver's license application, renewals, photographs, moving traffic offenses, parking violations.
- \*Motor vehicle registrations.
- \*Motor vehicle rental contracts.
- \*Immigration applications, visas, Immigration and Naturalization forms, files or documentation.
- \*Electronic intercepts or electronic surveillance including telephone recordings, wire transmissions, telegram records, telegram receipts, Emails, computer messages, computer records, computer files.
- \*Surveillance still or video photography.
- \*Flight training record to include syllabus, flight training documents, Federal Aviation Administration student pilot certificates, flight training jacket, records of payment, flight training schedules, ground school data & attendance, simulator, training & attendance.
- \*Documents that would identify flight, ground and simulator instructors.
- \*Documents that would identify training school or simulator school employees, clerical employees, managers or observers who met with, conversed with or otherwise facilitated training.