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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

AL-HARAMAIN ISLAMIC
 FOUNDATION, *et al.*,

CV. 06-274- KI

Plaintiffs,

v.

GEORGE W. BUSH, *et al.*,

Defendants.

**DEFENDANTS' MOTION FOR AN
 EXTENSION OF TIME TO RESPOND
 TO THE OREGONIAN'S
 MOTION TO UNSEAL RECORDS**

LOCAL RULE 7.1(a) CERTIFICATION

The parties have made a good faith effort to resolve this dispute. There is no objection to this request for an extension of time, as represented by both counsel for Plaintiffs and counsel for the Oregonian Publishing Company.

DEFENDANTS' MOTION FOR EXTENSION OF TIME

Defendants President George W. Bush, *et al.*, through undersigned counsel, hereby move for an extension of two weeks in which to file a response to the Oregonian Publishing Company's Motion to Intervene and to Unseal Records.

The grounds for this motion are as follows:

1. On March 20, 2006, the Court granted the Motion to Seal filed by Plaintiffs Al-Haramain Islamic Foundation, Inc., Wendell Belew, and Asim Ghafoor. See Order Granting Plaintiffs' Motion and Memorandum In Support To File Material Under Seal and Request For In-Camera Inspection (Mar. 20, 2006) [Docket No. 9].
2. On March 21, 2006, after a discussion with the parties regarding the sealed record, the Court permitted the sealed record to be stored in a secure facility in Seattle, Washington. See Order (Mar. 21, 2006) [Docket No. 11].
3. Issues related to the reasons why the sealed record may not be publicly disclosed — including the record's classified status and the harm to national security that would result from disclosure of this record — must be coordinated with several different governmental agencies in order to address the Oregonian Publishing Company's attempt to unseal the record.
4. Given the importance of this matter, no prejudice would result from a brief delay allowing Defendants to set forth fully the reasons why the sealed record cannot be publicly disclosed.

Accordingly, Defendants respectfully request a short two-week extension of time in which to file a response to the Oregonian's Motion to Intervene and to Unseal Records, making Defendants' response due on April 14, 2006.

Dated: March 29, 2006

Respectfully submitted,

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