Steven Goldberg, OSB 75134 (goldberg@goldbergmechanic.com) 621 SW Morrison, Suite 1450 Portland, OR 97205 503.224.2372 – Fax 503.224.1123

Thomas H. Nelson, OSB 78315 (nelson@thnelson.com)
Zaha S. Hassan, OSB 97062 (hassan@thnelson.com)
J. Ashlee Albies OSB # 05184 (albies@thnelson.com)
Thomas H. Nelson & Associates
825 NE Multnomah, Suite 925
Portland, OR 97232
503.230.8311 – Fax 503.230.8313

Jon B. Eisenberg, California Bar No. 88278 (jeisenberg@horvitzlevy.com) 1970 Broadway, Suite 1200 Oakland, CA 94612 510.452.2581 – Fax 510.452.3277

Lisa R. Jaskol, California Bar No. 138769 (ljaskol@horvitzlevy.com) 15760 Ventura Blvd., 18th Flr. Encino, CA 91436 818.995.5820 – Fax 818.995.3157

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

AL-HARAMAIN ISLAMIC FOUNDATION, INC., an Oregon Nonprofit Corporation, et al.,

Plaintiffs,

Case No. CV 06-274-KI

VS.

GEORGE W. BUSH, President of the United States, et al.

Defendants.

PLAINTIFFS' MOTION FOR ORDER COMPELLING DISCOVERY

ORAL ARGUMENT REQUESTED

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and LR 7.1, the parties have made a good faith effort through telephone conferences to resolve the dispute and have been unable to do so.

Pursuant to Fed. R. Civ. P. 37, Plaintiffs hereby move the Court for an order compelling Defendants to properly respond to Plaintiffs' First Set of Interrogatories to Defendants.

Defendants have filed objections, and have refused to respond to any of the twenty five interrogatories served by Plaintiffs.

This motion is based upon the Memorandum of Law attached hereto.

Further, Plaintiffs move for an award of reasonable attorney fees relating to the filing of this motion pursuant to Fed. R. Civ. P. 37(4)(A).

DATED this 22nd day of May, 2006.

Respectfully submitted,

STEVEN GOLDBERG, O

Of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PLAINTIFFS' MOTION FOR ORDER COMPELLING DISCOVERY upon the following:

Anthony J. Coppolino / Andrew Tannenbaum / Andrea Gacki U.S. Dept. of Justice P.O. Box 883, Rm. 6102 Washington D.C. 20044

Attorney for Defendant

_X	by <u>MAILING</u> a full, true and correct copy in a sealed envelope, with postage paid, addressed to the above-named party at last known address, and deposited with U.S. Postal Service in Portland, Oregon on this date.
,	by <u>ELECTRONIC DELIVERY VIA E-MAIL</u> a full, true and correct copy to the above-named party(ies) to the last known e-mail address on this date via the Court CM/ECF electronic filing system.
	by FAXING a full, true and correct copy to the above-named party to the fax listed above on this date. Said attorney's facsimile was operating at the time of service. The transmission was recorded and confirmed.
	by <u>HAND DELIVERING</u> a full, true and correct copy to the above-named party by messenger service to the last known office address of said party.
<u></u>	by OVERNIGHT COURIER a full, true and correct copy to the above-named party in a sealed envelope, with courier fees paid to the last know office street address of said party.
7.777.14.02.0006	

DATED: May 22, 2006.

Steven Goldberg, OSB No. 75134