

PETER D. KEISLER
 Assistant Attorney General, Civil Division
 CARL J. NICHOLS
 Deputy Assistant Attorney General
 JOSEPH H. HUNT
 Director, Federal Programs Branch
 ANTHONY J. COPPOLINO
 Special Litigation Counsel
tony.coppolino@usdoj.gov
 ANDREA GACKI
andrea.gacki@usdoj.gov
 ANDREW H. TANNENBAUM
andrew.tannenbaum@usdoj.gov
 Trial Attorneys
 U.S. Department of Justice
 Civil Division, Federal Programs Branch
 20 Massachusetts Avenue, NW
 Washington, D.C. 20001
 Phone: (202) 514-4782/(202) 514-4263/(202) 514-4336
 Fax: (202) 616-8460/(202) 616-8202/(202) 318-2461

KARIN J. IMMERGUT, OSB# 96314
 United States Attorney
 District of Oregon
 JAMES L. SUTHERLAND, OSB# 68160
 Assistant United States Attorney
 1000 SW Third Avenue, Suite 600
 Portland, Oregon 97204-2902
 Phone: (503) 727-1194
 Fax: (503) 727-1117
 Email: jim.sutherland@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

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

Plaintiffs,

v.

GEORGE W. BUSH, *et al.*,

Defendants.

CV. 06-274- KI

**DEFENDANTS' MOTION FOR A
 PROTECTIVE ORDER BARRING
 THE DEPOSITION OF
 BARBARA C. HAMMERLE**

ORAL ARGUMENT REQUESTED

Defendants President George W. Bush, *et al.*, respectfully request that the Court enter a protective order barring the deposition of Barbara C. Hammerle, Acting Director, Office of Foreign Assets Control, U.S. Department of Treasury, which has been noticed for June 12, 2006. Pursuant to Local Rule 7.1, the parties made a good faith effort, through e-mail communications on May 17, 2006, to resolve this dispute, and the parties were unable to do so.

Dated: June 9, 2006

Respectfully submitted,

PETER D. KEISLER
Assistant Attorney General

CARL J. NICHOLS
Deputy Assistant Attorney General

JOSEPH H. HUNT
Director, Federal Programs Branch

s/ Anthony J. Coppolino

ANTHONY J. COPPOLINO
Special Litigation Counsel
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W. Room 6102
Washington, D.C. 20001
Telephone: (202) 514-4782
Fax: (202) 616-8460
tony.coppolino@usdoj.gov

s/ Andrea Gacki

ANDREA GACKI
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W., Room 7334
Washington, D.C. 20001
Telephone: (202) 514-4336
Fax: (202) 318-2461
andrea.gacki@usdoj.gov

ANDREW H. TANNENBAUM
Trial Attorney

United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W. Room 7332
Washington, D.C. 20001
Telephone: (202) 514-4263
Fax: (202) 616-8202
andrew.tannenbaum@usdoj.gov

KARIN J. IMMERGUT, OSB# 96314
United States Attorney
District of Oregon

JAMES L. SUTHERLAND, OSB# 68160
Assistant United States Attorney
1000 SW Third Avenue, Suite 600
Portland, Oregon 97204-2902
Phone: (503) 727-1194
Fax: (503) 727-1117
Email: jim.sutherland@usdoj.gov

Attorneys for the United States of America