

ATTACHMENT 1

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

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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

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

Plaintiffs,

vs.

GEORGE W. BUSH, *et al.*,

Defendants.

No. CV 06 274 KI

NOTICE OF DEPOSITION

TO: Defendants, through their Counsel, Anthony J. Coppolino, Andrew H. Tannenbaum and
Andrea Marie Gacki, United States Department of Justice.

YOU ARE HEREBY NOTIFIED that the deposition of BARBARA C. HAMMERLE will be taken at the Bernabei Law Firm, 1773 T Street N.W., Washington, D.C., commencing at 9:30 a.m. on Monday, June 12, 2006, and continuing from day to day thereafter.

YOU ARE FURTHER NOTIFIED that the deponent, whose agency is a party to this action, is required to produce the following documents, records or other materials at said deposition: All documents supporting the allegation made by defendants on page 2 of Defendants' Response to the Oregonian's Motion to Intervene and to Unseal Records as follows: "Al-Haramain in Oregon was subsequently designated as a 'Specially Designated Global Terrorist' because of support provided to, *inter alia*, Usama bin Laden and the terrorist organization Al-Qa'ida."

The following definition applies to this production request:

Document: Includes but is not limited to all things subject to discovery under FRCP 26(b) and 34, including without limitation all printed, graphic, or recorded matter (including audio and videotape recordings), any letters, notes, work papers, memoranda, messages, calendars, diaries, desk books, contracts or written agreements, logs, lists, copies of any printed, typewritten, or handwritten matter or workbooks, in whatever form maintained which are subject to the possession, custody, or control of defendants. The term "Document" also includes any electronically stored data on magnetic or optical storage media as an "active" file or files (readily readable by one or more computer applications or forensics software); any "deleted" but recoverable electronic files on said media; any electronic file fragments (files that have been deleted and partially overwritten with new data); and slack (data fragments stored randomly from random access memory on a hard drive during the normal operation of a computer [RAM slack] or residual data left on the hard drive after new data has overwritten some but not all of previously stored data).

DATED: April _____, 2006.

STEVEN GOLDBERG, OSB 75134
Of Attorneys for Plaintiffs