

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ABU BAKKER QASSIM and A'DEL ABDU
AL-HAKIM,

Detainees,
Guantánamo Bay Naval Station,
Guantánamo Bay, Cuba;

Petitioners/Plaintiffs,

v.

GEORGE W. BUSH, et al.,

Respondents/Defendants.

Civil Action No. 05-0497 (JR)

**PETITIONERS' MOTION FOR
HEARING ON PENDING
MOTION FOR PRELIMINARY
INJUNCTION [DOCKET NO. 4]**

Pursuant to Local Civil Rule 7, Petitioners Abu Bakker Qassim and A'Del Abdu Al-Hakim move for a prompt hearing on their Motion for Preliminary Injunction, [Docket No. 4] filed March 15, 2005. As grounds, Petitioners say:

1. Petitioners filed their *Habeas Corpus* petition on March 10, 2005.
2. On March 15, 2005, Petitioners filed their motion for Preliminary Injunction ("Injunction Motion") [See Docket Nos. 4, 6]. The Injunction Motion requests 30-days' notice before any rendition by the Government of the Petitioners.
3. The Government objected to the Injunction Motion [Docket No. 7], and the matter is fully briefed.
4. Several procedural disputes are also pending before this Court, and the Court yesterday scheduled a status conference for May 16, 2005 at 11:30 a.m. However, no hearing has yet been scheduled on the Injunction Motion.
5. Because of the urgent danger to petitioners of rendition, we respectfully submit that waiting until May 16 to be heard is too long, and request a prompt hearing on the Injunction Motion. The grounds are set out in the injunction papers [Docket Nos. 4, 6]. The unique situation of the Uighurs (many of whom have already been determined by the United States not to represent a threat to its security) and these petitioners (as to whom the Government has

declined to say whether it regards them as any kind of threat) are also set out in papers filed on April 5, 2005 [Docket No. 12], and in particular in the materials attached to the accompanying Declaration of Susan Baker Manning.

6. Counsel is aware of this Court's order in *el-Mashad v. Bush*, no. 05-0270 (JR) (April 7, 2005). However, the Petitioners are differently situated than the petitioners in *el-Mashad*, for the reasons set out in the papers.

7. As a grant of this motion lies within the sound discretion of the Court, we submit that no memorandum of points and authorities is necessary.

WHEREFORE, Petitioners request that the Court schedule a hearing as soon as possible on the petitioners' Motion for Preliminary Injunction [Docket No. 4], and that it grant to the Petitioners such other and further relief as may be just and proper.

Dated: April 7, 2005

ABU BAKKER QASSIM and A'DEL ABDU
AL-HAKIM,

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