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BY EMAIL AND FEDERAL EXPRESS

Judry Laeb Subar
Terry S. Henry
United States Department of Justice, Civil Division
P.O. Box 883
20 Massachusetts Avenue, NW
Suite 7144
Washington, DC 20044

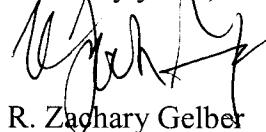
Re: *Hamlily v. Bush et al., Civil Action No. 05-763 (JDB)*

Dear Messrs Subpar and Henry:

I write to you concerning the aforementioned *habeas* action. As per the Case Management issued by Judge Hogan and subsequent Order issued by Judge Bates today, we hereby request that you produce the following mandatory discovery within 14 days of this letter: (1) any documents or objects in the Government's possession that are referenced in its factual return; (2) all statements, in whatever form, made or adopted by the Petitioner that relate to the information contained in the factual return; and (3) information about the circumstances in which such statements of the Petitioner were made or adopted.

We reserve any and all rights to request additional discovery at a later date.

Sincerely yours,



R. Zachary Gelber