

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:)	
)	
GUANTANAMO BAY)	Misc. No. 08-442 (TFH)
DETAINEE LITIGATION)	
<hr/>		
HANI SALEH RASHID ABDULLAH,)	
<i>et al.</i> ,)	
)	
<i>Petitioners,</i>)	
)	
v.)	Civil No. 05-0023 (RWR)
)	
GEORGE W. BUSH, <i>et al.</i> ,)	
)	
<i>Respondents.</i>)	
<hr/>		

REQUEST FOR DISCOVERY PURSUANT
TO CASE MANAGEMENT ORDER

Please provide all items described in section I.E.1 of the Case Management Order 14 days from today's date. With respect to "documents" as specified in that order we direct your attention to Rule 34(a) of the Federal Rules of Civil Procedure which include electronic, videotapes and related materials. With respect to subparagraph (3) of that section, we request a complete verified description of interrogation techniques employed on petitioner Abdullah, and, for each statement on which the government relies to justify detention -- and any antecedent statement concerning the same subject matter, of which the government

is aware -- a complete verified description of the conditions under which such statement was made in sufficient detail to allow the fact-finder to determine the voluntariness of the statement. This request applies to statements made while petitioner was in the custody of agencies other than the United States Department of Defense, including the Central Intelligence Agency, and civil or military authorities of the government of Pakistan.

Respectfully submitted,

Shayana Kadidal (DC # 454248)
CENTER FOR CONSTITUTIONAL
RIGHTS
666 Broadway, 7th Floor
New York, New York 10012
Tel: (212) 614-6439
Fax: (212) 614-6499

Of Counsel for Petitioner

Charles H. Carpenter (DC #432004)
PEPPER HAMILTON LLP
600 Fourteenth Street, N.W.
Suite 500, Hamilton Square
Washington, DC 20005-2004
Tel: (202) 220-1452
Fax: 202 220 1665

Stephen M. Truitt (DC # 13235)
William J. Bethune (DC # 66696)
PEPPER HAMILTON LLP
600 Fourteenth Street, N.W.
Suite 500, Hamilton Square
Washington, DC 20005-2004
Tel: (202) 220-1507
Fax: (202) 220-1665

Dated: November 7, 2008

Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 2008 a copy of the foregoing REQUEST FOR DISCOVERY PURSUANT TO CASE MANAGEMENT ORDER was emailed to the following counsel of record:

Terry Marcus Henry terry.henry@usdoj.gov

James C. Luh james.luh@usdoj.gov

Andrew I. Warden andrew.warden@usdoj.gov



Charles H. Carpenter