

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:)	
)	
GUANTANAMO BAY)	Misc. No. 08-442 (TFH)
DETAINEE LITIGATION)	
_____)	
MOHAMMED RAJEB ABU GHANEM)	
)	
<i>Petitioners,</i>)	
)	
v.)	Civil No. 05-1638 (CKK)
)	
GEORGE W. BUSH, <i>et al.</i> ,)	
)	
<i>Respondents.</i>)	
_____)	

**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, indicating that "documents" should include electronic materials, videotapes, and related materials.

With respect to subparagraph (3) of section I.E.1, we request a complete verified description of interrogation techniques employed on petitioner Ghanem. For each statement on which the government relies to justify petitioner's detention – and any antecedent statement concerning the same subject matter, of which the government is aware – we request a complete verified description of the conditions under which such a 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.

Respectfully submitted,

/s/ Brent Rushforth

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Of Counsel for Petitioner

Counsel for Petitioners

Dated: November 21, 2008