

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____		X
		:
IN RE:		:
		:
GUANTÁNAMO BAY		:
DETAINEE LITIGATION		:
		:
		:
_____		X
		:
OTHMAN, <i>et al.</i>		:
		:
	Petitioners,	:
		:
	v.	:
		:
BUSH, <i>et al.</i> ,		:
		:
	Respondents.	:
		:
_____		X

Misc. No. 08-442 (TFH)

Civil Action No. 05-2088 (RWR)

**STIPULATION TO STAY HABEAS PETITION**

WHEREAS, Petitioners filed a petition for a writ of habeas corpus in this Court on October 25, 2005; and

WHEREAS, Petitioners now seek to stay this habeas petition and Respondents have agreed to such a stay;

IT IS STIPULATED by and between undersigned counsel, subject to the approval of the Court, that:

- (1) The above-captioned petition for a writ of habeas corpus shall be stayed;
- (2) The parties' obligations under this Court's November 6, 2008 Case Management Order shall be suspended with respect to this petitioner unless and until the stay is lifted by the Court;

(3) Either counsel for Petitioners or counsel for Respondents may move to lift the stay upon notice to counsel for the opposing party;

(4) The terms and effect of this Court's September 11, 2008 Protective Order and Procedures for Counsel Access to Detainees at the United States Naval Base in Guantánamo Bay, Cuba (the "Protective Order") shall remain in effect;

(5) The terms and effect of this Court's July 11, 2008 Order (Dkt. 41), requiring Respondents to provide Petitioners' counsel and the Court with thirty day's advance notice prior to any intended removal or transfer of a prisoner from Guantánamo Bay, Cuba shall remain in effect; and

(6) This stipulation may be executed in counterparts, each of which when so executed shall be deemed an original.

Date: November 26, 2008

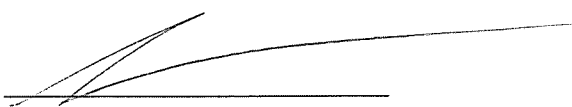
Respectfully submitted,

Counsel for Petitioners:



Shayana Kadidal (D.C. Bar No. 454248)  
Gitanjali S. Gutierrez (pursuant to LCvR 83.2(g))  
Pardiss Kebriaei (pursuant to LCvR 83.2(g))  
CENTER FOR CONSTITUTIONAL RIGHTS  
666 Broadway, 7th Floor  
New York, New York 10012  
Tel: (212) 614-6438  
Fax: (212) 614-6499  
kadidal@ccrjustice.org

Counsel for Respondents:



---

Terry Marcus Henry  
U.S. DEPARTMENT OF JUSTICE  
CIVIL DIVISION  
P.O. Box 883  
20 Massachusetts Avenue, NW  
Suite 7212  
Washington DC 20044  
(202) 514-4107  
Fax: (202) 616-8470  
Email: terry.henry@usdoj.gov

Scott Michael Marconda  
U.S. DEPARTMENT OF JUSTICE  
20 Massachusetts Avenue, NW  
Room 5130  
Washington DC 20530  
(202) 305-0169  
Email: scott.marconda@usdoj.gov

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

---

United States District Judge