

filed later in time. Together, the government's failure to file a factual return, in conjunction with the present motion for reconsideration as to Petitioner Saeed is an unreasonable delay of the proceedings to which he is entitled under *Boumediene v. Bush*, 128 S. Ct. 2229 (2008).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2008, I filed the foregoing electronically through the CM/ECF system, which caused the following counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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