

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IN RE: GUANTANAMO BAY DETAINEE LITIGATION)))))	Misc. No. 08-0442 (TFH) Civil Action No. 05-CV - 2386 (RBW)
--	-----------------------	---

CONSENT MOTION FOR STAY OF PROCEEDINGS

Petitioner Maasoum Abdah Mouhammad, a/k/a Bilal LNU (ISN 330), seeks an indefinite stay of all proceedings in his individual habeas proceeding. Respondents consent to the Motion.

Petitioner and Respondents agree that the obligations of both Petitioner and Respondents under Judge Hogan’s November 6, 2008 Case Management Order (“CMO”), Judge Walton’s November 12, 2008 modifications thereto, and any subsequent modifications to the CMO in response to Respondents’ Motion for Clarification and Reconsideration of the CMO, should be stayed with respect to Petitioner unless and until this consent stay is lifted, and that either party may seek to lift this stay at any time for any reason. Petitioner and Respondents also agree that during the pendency of the stay, the Protective Order and 30-Day Notice Order governing Petitioner (entered by Judge Hogan on July 11, 2008, Docket No. 52 in Misc. No. 08-442 and availed of by Petitioner’s counsel in a Notice emailed to Respondent’s counsel Andrew Warden on July 11, 2008) will remain operative with respect to Petitioner.

Dated: December 2, 2008

Respectfully submitted,

/s/ Adam R. Chiss
 Lowell E. Sachnoff (Illinois Bar No. 02438062)
 Matthew J. O’Hara (Illinois Bar No. 6237795)
 Adam R. Chiss (Illinois Bar No. 6272056)
 Brian C. Lewis (D.C. Bar No. 476851)
 J. Andrew Moss (Illinois Bar No. 6270313)
 REED SMITH LLP

10 S. Wacker Drive, Suite 4000
Chicago, IL 60606
(312) 207-1000 (phone)
(312) 207-6400 (fax)

Shayana Kadidal
CENTER FOR CONSTITUTIONAL
RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
(212) 614-6423 (phone)
(212) 614-6499 (fax)

Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned states that on December 2, 2008, I filed the foregoing Consent Motion for Stay of Proceedings on behalf of Petitioner MAASOUM ABDAH MOUHAMMAD a/k/a BILAL LNU with the Clerk of the Court using the district court's ECF system, which will send notification of such filings to all counsel of record.

/s/ J. Andrew Moss
REED SMITH LLP
10 S. Wacker Drive, 40th Floor
Chicago, Illinois 60606
(312) 207-1000

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IN RE:)	Misc. No. 08-0442 (TFH)
GUANTANAMO BAY)	
DETAINEE LITIGATION)	Civil Action No. 05-CV - 2386 (RBW)
)	

[PROPOSED] ORDER

Before the Court is the Consent Motion for Stay of Proceedings filed by Petitioner Maasoum Abdah Mouhammad, a/k/a Bilal LNU (ISN 330), on November 26, 2008.

Upon consideration of the Motion, it is this ___ day of November/December, 2008, hereby **ORDERED** that the Motion is **GRANTED** and that proceedings for this Petitioner be stayed; and it is further

ORDERED that the Protective Order and 30-Day Notice Orders previously entered in this miscellaneous case number (Misc. No. 08-0442) shall continue in effect during the pendency of the stay; and it is further

ORDERED that either party may move the Court to lift the stay at any time in the future.

Judge Reggie B. Walton
United States District Judge