

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE :
GUANTANAMO BAY
DETAINEE LITIGATION

Misc. No. 08-442 (TFH)

ALI SHAH MOUSOVI, et al.,
Petitioners/Plaintiffs,

Civil No. 05-CV-1124 (RMC)

v.

GEORGE W. BUSH, et al.,
Respondents/Defendants.

HAMID AL RAZAK, et al.,
Petitioners/Plaintiffs,

Civil No. 05-CV-1601 (GK)

v.

GEORGE W. BUSH, et al.,
Respondents/Defendants.

ABDULLAH WAZIR ZADRAN, et al.
Petitioners/Plaintiffs,

Civil No. 05-CV-2367 (RWR)

v.

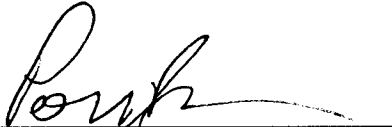
GEORGE W. BUSH, et al.,
Respondents/Defendants.

MEMORANDUM OF UNDERSTANDING REGARDING ACCESS TO
CLASSIFIED NATIONAL SECURITY INFORMATION

Having familiarized myself with the applicable statutes, regulations, and orders related to, but not limited to, unauthorized disclosure of classified information, espionage and related offenses; The Intelligence Identities Protection Act, 50 U.S.C. § 421; 18 U.S.C. § 641; 50 U.S.C. § 783; 28 C.F.R. § 17 et seq., and Executive Order 12958; I understand that I may be the recipient of information and documents that belong to the United States and concern the present and future security of the United States, and that such documents and information together with the methods and sources of collecting it are classified by the United States government. In consideration for the disclosure of classified information and documents:

- (1) I agree that I shall never divulge, publish, or reveal either by word, conduct or any other means, such classified documents and information unless specifically authorized in writing to do so by an authorized representative of the United States government, or as expressly authorized by the Protective Order entered in the United States District Court for the District of Columbia in the above-captioned cases.
- (2) I agree that this Memorandum of Understanding and any other non-disclosure agreement signed by me will remain forever binding on me.
- (3) I have received, read, and understand the Protective Order entered by the United States District Court for the District of Columbia in the above-captioned cases, and I agree to comply with the provisions thereof.

Date: December 18, 2008


Peter M. Ryan
Dechert LLP
Cira Centre, 2929 Arch Street
Philadelphia, PA 19104-2808
Telephone: 215.994.2449
Fax: 215.655.2449

Counsel for Petitioners

CERTIFICATE OF SERVICE

I, Peter M. Ryan, hereby certify that on December 18, 2008 I caused to be served via electronic filing a true and correct copy of the foregoing Memorandum of Understanding Regarding Access to Classified National Security Information on counsel of record for Respondents, as follows:

Andrew Warden
andrew.warden@usdoj.gov
United States Department of Justice
Civil Division
20 Massachusetts Avenue, N.W.
Washington, D.C. 20530

Jane L. Westby
U.S. Department of Justice
20 Massachusetts Ave., N.W., Suite 5115
Washington, D.C. 20530
jane.westby2@usdoj.gov

Terry M. Henry
Terry.Henry@usdoj.gov
United States Department of Justice
Civil Division
20 Massachusetts Avenue, N.W.
Washington, D.C. 20530

Kathryn C. Mason
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7221
Washington, D.C. 20530
Kathryn.Mason@usdoj.gov

Erik Ablin
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W.
Washington, DC 20530
Erik.Ablin2@usdoj.gov

Kristina Ann Wolfe
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W.
Washington, DC 20530
Kristina.Wolfe@usdoj.gov

/s/ Peter M. Ryan
Peter M. Ryan