

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

**ABDURRAHMAN ABDALLAH ALI
MAHMOUD AL SHUBATI,**

Petitioner/Plaintiff,

v.

GEORGE W. BUSH, et al.,

Respondents/Defendants.

MISC. NO. 08-442 (TFH)

**CIVIL ACTION NO. 07-CV-02338
(HHK)**

PETITIONER'S UNOPPOSED MOTION TO ENTER PROTECTIVE ORDER

In this unopposed motion, Petitioner respectfully moves the Court to enter the November 8, 2004 Protective Order, as amended on November 10, 2004 and December 13, 2004, in the *In re Guantanamo Bay Detainee Cases*, Civil No. 02-0299, *et al.*, by Judge Joyce Hens Green. A copy of the proposed Protective Order is attached hereto as Exhibit 1. The amendments to the Protective Order are attached as Exhibits 2 and 3.¹

The Supreme Court's recent decision in *Boumediene v. Bush*, No. 06-1195, Slip op. at 66 (June 12, 2008) establishes that this court has jurisdiction to consider Petitioner's writ of habeas corpus. Consequently, the United States does not contest that entry of the habeas protective order is appropriate. Entry of the protective order is necessary for Petitioner's counsel to meet the litigation demands of Petitioner's pending

¹ In consenting to the entry of the habeas protective order, Respondents reserve their right to seek modifications to the protective order and supplemental orders as appropriate. Respondents' consent to entry of the orders is without prejudice to such a right.

habeas action. For these reasons, Petitioner respectfully moves the Court to enter the protective order in this case.

Dated: July 7, 2008

Respectfully submitted,

Counsel for Petitioner:

/s/ Brent N. Rushforth

Brent N. Rushforth (DC 331074)

Kit A. Pierson (DC 398123)

HELLER EHRMAN LLP

1717 Rhode Island Avenue, NW

Washington, DC 20036

Tel: (202) 912-2000

Fax: (202) 912-2020

Shayana Kadidal (DC 49512)

Pardiss Kebriaei (DC 51395)

**CENTER FOR CONSTITUTIONAL
RIGHTS**

666 Broadway, 7th Floor

New York, New York 10012

Tel: (212) 614-6439

Fax: (212) 614-6499

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

**ABDURRAHMAN ABDALLAH ALI
MAHMOUD AL SHUBATI,**

Petitioner/Plaintiff,

v.

GEORGE W. BUSH, et al.,

Respondents/Defendants.

MISC. NO. 08-442 (TFH)

**CIVIL ACTION NO. 07-CV-02338
(HHK)**

CERTIFICATE OF SERVICE

I hereby certify that, on this 7th day of July, 2008, I caused a true and correct copy of the **PETITIONER'S UNOPPOSED MOTION TO ENTER PROTECTIVE ORDER** to be served electronically via the ECF system on:

TERRY M. HENRY
ANDREW WARDEN
JUDRY SUBAR
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W.
Washington, DC 20530
Tel: (202) 514-4107
Fax: (202) 616-8470
Counsel for Respondents

/s/ Brent N. Rushforth