

Attachments: Scan001.PDF

-----Original Message-----

From: Carpenter, Charles

Sent: Monday, December 22, 2008 11:38 PM

To: Henry, Terry (CIV); 'david.avila2@usdoj.com'

Cc: 'james.luh@doj.gov'; 'andrew.warden@doj.gov'; 'Stephen Truitt'

Subject: Revised Discovery Request

Attached hereto is a revised discovery request. It is submitted without prejudice to our position that we are entitled to production of all responsive documents immediately (as described in our motion to compel, filed moments ago).

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▲

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                                 |   |                         |
|---------------------------------|---|-------------------------|
| IN RE:                          | ) |                         |
|                                 | ) |                         |
| GUANTANAMO BAY                  | ) | Misc. No. 08-442 (TFH)  |
| DETAINEE LITIGATION             | ) |                         |
| <hr/>                           |   |                         |
| HANI SALEH RASHID ABDULLAH,     | ) |                         |
| <i>et al.</i> ,                 | ) |                         |
|                                 | ) |                         |
| <i>Petitioners,</i>             | ) |                         |
|                                 | ) |                         |
| v.                              | ) | Civil No. 05-0023 (RWR) |
|                                 | ) |                         |
| GEORGE W. BUSH, <i>et al.</i> , | ) |                         |
|                                 | ) |                         |
| <i>Respondents.</i>             | ) |                         |
| <hr/>                           |   |                         |

REVISED REQUEST FOR DISCOVERY PURSUANT  
TO CASE MANAGEMENT ORDER

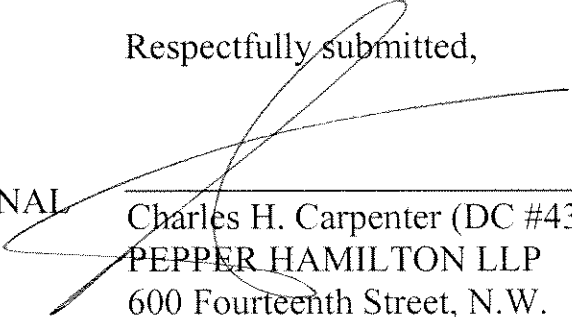
Please provide all items described in section I.E.1 of the Case Management Order within 14 days, or such shorter period that the Court may order. With respect to "documents" as specified in that order we direct your attention to Rule 34(a) of the Federal Rules of Civil Procedure which include electronic, videotapes and related materials. With respect to subparagraph (3) of that section, we request a complete verified description of interrogation techniques employed on petitioner Abdullah, and, for each statement on which the government relies to justify detention -- and any antecedent statement concerning

the same subject matter, of which the government is aware -- a complete verified description of the conditions under which such statement was made in sufficient detail to allow the fact-finder to determine the voluntariness of the statement. This request applies to statements made while petitioner was in the custody of agencies other than the United States Department of Defense, including the Central Intelligence Agency, and civil or military authorities of the government of Pakistan.

Respectfully submitted,

Shayana Kadidal (DC # 454248)  
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Dated: December 22, 2008

*Counsel for Petitioners*

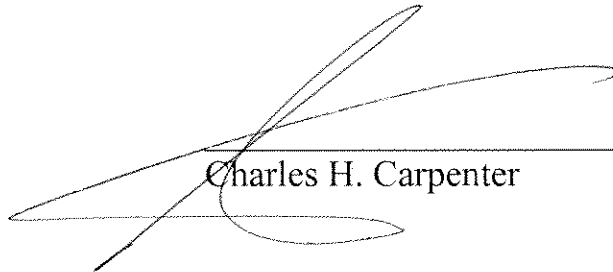
## CERTIFICATE OF SERVICE

I hereby certify that on this 22d day of December, 2008 a copy of the foregoing REVISED REQUEST FOR DISCOVERY PURSUANT TO CASE MANAGEMENT ORDER was emailed to the following counsel of record:

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