

justification for detaining” petitioners. This review built upon prior processes for including such information in the factual returns, and included additional reasonable and systematic searches within the relevant universe of information, including for information that would materially undermine the credibility of any fact witness the Government relies upon to justify petitioners’ detention.

The Government has disclosed or is disclosing information required by Section I.D.1, if any, as set forth in the supplemental certifications or notices pertaining to production of exculpatory information filed in the individual above-captioned cases. To the extent such supplemental filings indicate that information has been identified but has yet to be produced, a final certification will be filed upon completion of the production.

If any further exculpatory information becomes known to the Government, it shall be disclosed as soon as practicable pursuant to Section I.D.2 of the CMO.

Respectfully submitted,

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