IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MOTAI SAIB, et al.,)
Petitioners/Plaintiffs,)
v.) Civil No. 05-CV-1353 (RMC)
BARACK H. OBAMA, et al.,)
Respondents/Defendants.)

UNOPPOSED MOTION TO SEAL UNCLASSIFIED TRAVERSE AND EXHIBITS

Pursuant to LCvR 5.1(j), Petitioner Motai Saib respectfully requests that the Court permit him to file under seal the concurrently filed Unclassified Traverse. In support of this Motion, Petitioner states:

- Counsel for Petitioner has conferred with counsel for Respondents, and Respondents do not oppose this request.
- 2. The Unclassified Traverse contains protected information, as defined by the Protective Order in place in this action. Sealing the Uncassified Traverse would ensure the information is appropriately treated.
- No party will be prejudiced by sealing of documents related to the Emergency Motion.

WHEREFORE, Petitioner Saib respectfully requests that this Motion be granted and that the Unclassified Traverse and Exhibits be filed under seal.

Dated: February 9, 2009

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2009, pursuant to LCvR 5.1(j)(2), I filed the foregoing MOTION TO SEAL UNCLASSIFIED TRAVERSE by causing the original to be delivered to the Clerk of the Court via UPS OVERNIGHT.

I further certify that I served a copy of the MOTION TO SEAL on counsel for Respondents via electronic mail, at the addresses stated below:

United States Department of Justice

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