

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

SUFYIAN BARHOUMI (ISN 694), <i>et al.</i>	)	
	)	
Petitioners	)	Civil No. 05-CV-1506 (RMC)
	)	
v.	)	
	)	
BARACK H. OBAMA, <i>et al.</i> <sup>1</sup>	)	
	)	
Respondents.	)	
	)	
	)	

**UNOPPOSED MOTION FOR EXTENSIONS OF TIME**

1. Petitioner Sufyian Barhoumi, through his counsel, respectfully requests that the Court grant Petitioner a 28-day extension of time to submit his Classified Traverse, any requests to rely on hearsay and Motion for Judgment on the Record. Petitioner requests that he be allowed to submit his Classified Traverse on or before March 13, 2009, that he be allowed to submit any requests to rely on hearsay on or before March 20, 2009 and that he be allowed to submit his Motion for Judgment on the Record on or before March 27, 2009.

2. This is Petitioner’s first request for an extension of time under the Case Management Order.

3. Pursuant to LCvR 7.1, the undersigned has conferred with counsel for Respondents and Respondents do not oppose the requested extensions.

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<sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), President Obama is substituted for former President Bush.

4. Pursuant to the Case Management Order (“CMO”) issued by Judge Hogan on November 6, 2008 (Doc. #131) as modified on December 16, 2008 (Doc. # 149), the following deadlines currently govern this matter:

- February 13, 2009: Petitioner’s Traverse To The Factual Return.
- February 20, 2009: Requests to Rely on Hearsay.
- February 27, 2009: Motions for Judgment on the Record.

5. Petitioner will submit the classified portion of his Traverse by February 13, 2009.

6. Pursuant to § III(A)(1) of the CMO, Motions for Judgment on the Record are due within 14 days of the filing of the Traverse. Pursuant to § II(C), requests to rely on hearsay are due 7 days prior to Motions for Judgment on the Record.

7. Petitioner requires a 28-day extension from these deadlines because Petitioner’s counsel is hoping to visit Petitioner at Guantanamo in early March. This visit may result in additional information supporting the Traverse and/or Motion for Judgment on the Record and may impact any request to rely on hearsay.

8. Further, Petitioner’s counsel is located in Denver, Colorado. The Secure Facility that holds the classified information in this case is located in Washington, D.C. A Motion for Judgment on the Record will require the review and citation of classified information. Petitioner’s counsel traveled to the Secure Facility in late January 2009 in order to review the classified factual return and begin preparation of the Classified Traverse. An extension until March 13 for submission of the Classified Traverse and March 27 for submission of Motions for Judgment on the Record will allow counsel to

make a trip to Washington, D.C. in March for completion of the Classified Traverse and preparation of the Motion for Judgment on the Record.

9. No party will be prejudiced by these requested extensions, nor will the extensions impact any scheduled proceedings.

WHEREFORE, Petitioner respectfully requests an additional 28 days to submit any requests to reply on hearsay and a Motion for Judgment on the Record.

Dated: February 12, 2009

Respectfully submitted,

*/s/ Nadya C. Bosch*

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**CERTIFICATE OF SERVICE**

I hereby certify that on 02/12/2009, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to the following:

United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Ave., N.W., Room 7144  
Washington, DC 20530

*/s/ Nadya C. Bosch*  
Holland & Hart LLP

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