

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

IN RE:

**GUANTANAMO BAY
DETAINEE LITIGATION**

:
:
:
:
:
:
:

Misc. No. 08-442 (TFH)

Civil Action No. 08-1828 (RMU)

UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to the Court's Order of December 12, 2008, Petitioner Mullah Norullah Noori, ISN 006, ("Petitioner"), through his undersigned counsel, respectfully requests an extension of time, until March 31, 2009, to file an authorization or counsel's declaration regarding his representation.

1. The Court has ordered filing of authorizations or counsel's declaration regarding the representation of Petitioners by February 12, 2009.

2. Petitioner's counsel plan to visit Guantanamo Bay Naval Station ("GTMO") during the week of March 16, 2009 and will attempt to meet with Petitioner at that time. Assuming this meeting goes forward as scheduled, counsel will seek to obtain an executed authorization from the Petitioner for the undersigned counsel to represent him.

3. Pursuant to Local Civil Rule 7(m), the undersigned counsel for Petitioner conferred with Respondents' counsel regarding the relief sought in this motion. Respondents' counsel have no objection to this motion.

4. Respondents agree to complete all pending discovery obligations under Sections I.E.1. and I.D.1. of Judge Hogan's Case Management Order dated November 6, 2008, as amended on December 16, 2008 (the "CMO"). Respondents will have no further discovery

obligations, and Petitioner agrees to hold off on further discovery requests, until the later of (1) March 31, 2009; or (2) the day the authorization or counsel's declaration is filed.

5. Petitioner's Traverse will be due two weeks after the later of (1) Respondents filing the notice certifying that they have disclosed all exculpatory evidence under Section I.D.1. of the CMO; or (2) Petitioner's counsel filing the authorization or counsel's declaration thereof.

6. To allow for adequate time to obtain a cleared authorization or counsel's declaration, counsel request an extension of time until March 31, 2009 in which to file the authorization for the Petitioner. Upon receipt of the declassified authorization, counsel will promptly file it with the Court.

7. Counsel currently are authorized to represent Petitioner pursuant to the "next friend" provision of the federal habeas statute.

Respectfully submitted,

/s/ Patricia A. Sullivan

Deming E. Sherman (#1138)

Patricia A. Sullivan (#2120)

EDWARDS ANGELL PALMER & DODGE LLP

2800 Financial Plaza

Providence, RI 02903

Tel: (401) 274-9200

Fax: (401) 276-6611

psullivan@eapdlaw.com

dsherman@eapdlaw.com

Jared A. Goldstein

ROGER WILLIAMS UNIVERSITY

SCHOOL OF LAW

Ten Metacom Avenue

Bristol, RI 02809

Tel: (401) 254-4594

Michael Ratner
Shayana Kadidal
J. Wells Dixon
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, New York 10012
Tel: (212) 614-6464
Fax: (212) 614-6499

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of February, 2009, a true copy of the foregoing document was served upon each attorney of record in Misc. No. 08-442 (TFH) and C.A. No. 08-1828(RMU), by electronic filing, via ECF, of this document with the United States District Court for the District of Columbia:

/s/ Patricia A. Sullivan