

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

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

UNOPPOSED MOTION FOR LEAVE TO SUPPLEMENT THE RECORD

Petitioner Motai Saib respectfully requests that the Court permit him to supplement the record with the declarations of Dr. Sheila Carapicio (and attachments) (Exhibit A) and Mr. Alastair Crooke (Exhibit B). In support of this motion, Petitioner states as follows:

1. Counsel for Petitioner has conferred with counsel for Respondents. As stated in Respondents Unopposed Motion for Extension of Time (Dck. #202), Respondents do not oppose Petitioner’s request to supplement the record with these additional declarations and do not oppose their admission. Respondents do not, however, believe that the declarations are material or relevant to the legality of Petitioner’s detention and the government intends to address these deficiencies in the merits proceedings.

2. For the reasons stated in Petitioner’s Unclassified Motion for Judgment on the Record at pages 4-5 (filed under seal, *see* Dcks. # 203 and 207), Petitioner maintains that the declarations are material and relevant to the legality of Petitioner’s detention.

WHEREFORE, Petitioner Saib respectfully requests that this Motion be granted and that the Court permit Petitioner to supplement the record with the declarations attached hereto as Exhibits A and B.

Dated: April 21, 2009

Respectfully submitted,

/s Danielle R. Voorhees

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CERTIFICATE OF SERVICE

I hereby certify that on 4/21/2009, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to the following:

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