



July 19-22, 2009. As set forth in previous pleadings by counsel for both Petitioner and Respondent, Counsel has not met with Mr. Idris on five prior visits to Guantanamo Bay. The Motion For Direct Contact is directed at facilitating those circumstances which have, in other motions before Judges of this Court, successfully resulted in attorneys meeting with their respective clients for the first time. The importance of this initial meeting, which arguably is the only method of accurately determining Mr. Idris' intentions with respect to this litigation, cannot be understated.

An expedited schedule is reasonable to the parties in that the Motion For Direct Access presents the same narrow issues and requested relief which has been briefed, argued, and ruled upon in previous cases. Moreover, the resulting respective Orders have been successfully implemented by the DOD and counsel at Guantanamo Bay.<sup>2</sup> To that end, Counsel would move that the Government's Reply to the Motion for Direct Access be due on or before July 10, 2009, in order to allow this Court adequate time for consideration and ruling on that motion. Alternatively, if this Court is does not modify the deadline for the Government's Reply to Petitioner's Motion For Direct Access, Counsel would respectfully seek a ruling from this Court on or before Friday, July 17, 2009, in order to allow such an Order, if granted, to be implemented during the July 19, 2009 visitation at Guantanamo Bay.

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<sup>2</sup> As cited in Petitioner's Motion For Direct Access, the same issue before this Court was ruled upon brought by Petitioner Jamil Ahmad Saeed (ISN 728) (Case No. 05-CV-2386, Docket Entry No. 1177, 05/01/2009 and Petitioner Hamoud Abdulah Hamoud Hassan Al-Wady, Case No. 08-CV-1237, Docket Entry No. 111, 05/01/2009.

July 1, 2009

Respectfully submitted,

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