

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE :

GUANTANAMO BAY
DETAINEE LITIGATION

Misc. No. 08-442 (TFH)

ALI SHAH MOUSOVI, et al.,
Petitioners/Plaintiffs,

Civil No. 05-CV-1124 (RMC)

v.

GEORGE W. BUSH, et al.,
Respondents/Defendants.

HAMID AL RAZAK, et al.,
Petitioners/Plaintiffs,

Civil No. 05-CV-1601 (GK)

v.

GEORGE W. BUSH, et al.,
Respondents/Defendants.

ABDULLAH WAZIR ZADRAN, et al.
Petitioners/Plaintiffs,

Civil No. 05-CV-2367 (RWR)

v.

GEORGE W. BUSH, et al.,
Respondents/Defendants.

MEMORANDUM OF UNDERSTANDING REGARDING ACCESS TO
CLASSIFIED NATIONAL SECURITY INFORMATION

Having familiarized myself with the applicable statutes, regulations, and orders related to, but not limited to, unauthorized disclosure of classified information, espionage and related offenses; The Intelligence Identities Protection Act, 50 U.S.C. § 421; 18 U.S.C. § 641; 50 U.S.C. § 783; 28 C.F.R. § 17 et seq., and Executive Order 12958; I understand that I may be the recipient of information and documents that belong to the United States and concern the present and future security of the United States, and that such documents and information together with the methods and sources of collecting it are classified by the United States government. In consideration for the disclosure of classified information and documents:

- (1) I agree that I shall never divulge, publish, or reveal either by word, conduct or any other means, such classified documents and information unless specifically authorized in writing to do so by an authorized representative of the United States government, or as expressly authorized by the Protective Order entered in the United States District Court for the District of Columbia in the above-captioned cases.
- (2) I agree that this Memorandum of Understanding and any other non-disclosure agreement signed by me will remain forever binding on me.
- (3) I have received, read, and understand the Protective Order entered by the United States District Court for the District of Columbia in the above-captioned cases, and I agree to comply with the provisions thereof.

Date: February 17, 2010



Kevin S. Blume
Dechert LLP
200 Clarendon St., 27th Floor
Boston, MA 02116
Telephone: 617.728.7100
Fax: 617.426.6567
kevin.blume@dechert.com

Counsel for Petitioners

CERTIFICATE OF SERVICE

I, Kevin Blume, hereby certify that on February 17, 2010, I caused to be served via electronic filing and email a true and correct copy of the foregoing Memorandum of Understanding Regarding Access to Classified National Security Information on counsel of record for Respondents, as follows:

Andrew Warden
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W.
Washington, D.C. 20530
Andrew.Warden@usdoj.gov

Thomas M. Bell
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7221
Washington, D.C. 20530
t.march.bell@usdoj.gov

Terry M. Henry
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W.
Washington, D.C. 20530
Terry.Henry@usdoj.gov

Mary Carney
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7221
Washington, D.C. 20530
Mary.Carney@usdoj.gov

Ronald J. Wiltsie
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, NW
Washington, DC 20530
Ronald.Wiltsie@usdoj.gov

Julia Berman
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7221
Washington, D.C. 20530
Julia.Berman@usdoj.gov

Nancy Safavi
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7221
Washington, D.C. 20530
Nancy.Safavi@usdoj.gov

Daniel Barish
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W., Room 7221
Washington, D.C. 20530
Daniel.Barish@usdoj.gov

Linda Alberty
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., N.W. Suite 5100
Washington, D.C. 20530
Linda.B.Alberty@usdoj.gov

/s/ Kevin S. Blume
Kevin S. Blume