

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

)	Misc. No. 08-mc-442 (TFH)
IN RE:)	
)	Civil Action Nos.
GUANTANAMO BAY)	
DETAINEE LITIGATION)	02-cv-0828, 04-cv-1136, 04-cv-1164, 04-cv-1937, 04-cv-2022,
)	04-cv-2035, 04-cv-2046, 04-cv-2215, 05-cv-0247, 05-cv-0270,
)	05-cv-0280, 05-cv-0329, 05-cv-0359, 05-cv-0392, 05-cv-0409,
)	05-cv-0492, 05-cv-0569, 05-cv-0583, 05-cv-0634, 05-cv-0748,
)	05-cv-0763, 05-cv-0877, 05-cv-0879, 05-cv-0880, 05-cv-0881,
)	05-cv-0883, 05-cv-0886, 05-cv-0889, 05-cv-0892, 05-cv-0993,
)	05-cv-0994, 05-cv-0995, 05-cv-0999, 05-cv-1012, 05-cv-1013,
)	05-cv-1048, 05-cv-1189, 05-cv-1220, 05-cv-1234, 05-cv-1236,
)	05-cv-1239, 05-cv-1244, 05-cv-1310, 05-cv-1312, 05-cv-1347,
)	05-cv-1353, 05-cv-1429, 05-cv-1457, 05-cv-1458, 05-cv-1490,
)	05-cv-1497, 05-cv-1504, 05-cv-1506, 05-cv-1555, 05-cv-1592,
)	05-cv-1601, 05-cv-1602, 05-cv-1607, 05-cv-1623, 05-cv-1638,
)	05-cv-1639, 05-cv-1645, 05-cv-1646, 05-cv-1679, 05-cv-1704,
)	05-cv-1725, 05-cv-1971, 05-cv-1983, 05-cv-2010, 05-cv-2088,
)	05-cv-2185, 05-cv-2186, 05-cv-2199, 05-cv-2201, 05-cv-2248,
)	05-cv-2249, 05-cv-2348, 05-cv-2349, 05-cv-2370, 05-cv-2371,
)	05-cv-2378, 05-cv-2379, 05-cv-2380, 05-cv-2381, 05-cv-2398,
)	05-cv-2444, 06-cv-0618, 06-cv-1668, 06-cv-1684, 06-cv-1690,
)	06-cv-1725, 06-cv-1758, 06-cv-1759, 06-cv-1761, 06-cv-1765,
)	06-cv-1766, 06-cv-1767, 07-cv-1710, 07-cv-2337, 07-cv-2338,
)	08-cv-1085, 08-cv-1101, 08-cv-1153, 08-cv-1173, 08-cv-1207,
)	08-cv-1222, 08-cv-1224, 08-cv-1227, 08-cv-1228, 08-cv-1229,
)	08-cv-1230, 08-cv-1231, 08-cv-1232, 08-cv-1233, 08-cv-1234,
)	08-cv-1235, 08-cv-1236, 08-cv-1237, 08-cv-1238, 08-cv-1310,
)	08-cv-1360, 08-cv-1440, 08-cv-1805, 08-cv-1828, 08-cv-1923,
)	08-cv-2019, 08-cv-2083, 09-cv-0031, 09-cv-0745, 09-cv-0873,
)	09-cv-0904, 09-cv-1332, 09-cv-1385, 09-cv-1460, 09-cv-1461,
)	09-cv-1462, 09-cv-2368

**RESPONDENTS' UNOPPOSED MOTION TO FILE A
CONSOLIDATED REPLY AND FOR AN EXTENSION OF
TIME TO REPLY TO THE RESPONSES
OF PETITIONERS AND PRESS INTERVENORS**

Respondents, by and through undersigned counsel, hereby move this Honorable Court to allow Respondents to file one consolidated reply brief, replying both to the arguments of Press Intervenor and to those of the Petitioners, following the submission of the Petitioners'

Consolidated Response to Respondents' Motion to Amend and for Clarification of the Court's January 14, 2010 Order Regarding Public Returns. Accordingly, Respondents move for an extension of time to reply to the opposition of Press Intervenors filed on May 3, 2010 from May 13, 2010 until such time that Respondents reply to Petitioners' consolidated response,¹ and also for an extension of time to reply to Petitioners' response(s). Respondents request that their consolidated reply be due three weeks after Petitioners' consolidated response, on June 24, 2010.

An extension of time to allow a consolidated reply will provide a more efficient means of litigating these issues, allowing Respondents to reply to all arguments raised by any party at one time. The extension of time will not prejudice any party to this litigation, since the Court will not be in a position to fully consider Respondents' motion and any responses or replies until after Petitioners have filed their response.

Pursuant to LCvR 7(m), counsel for Respondents met and conferred with representative counsel for Petitioners and counsel for Press Intervenors regarding the instant motion. Darin Thompson, on behalf of Petitioners' counsel, stated that Petitioners have no objection to either Respondents' request to file a consolidated motion or the request for an extension until June 24,

¹ Prior to May 3, Respondents advised Press Intervenors that Respondents were preparing an unclassified version of Respondents' April 14, 2010 filing to share with them. In fact, Respondents provided the unclassified version to Press Intervenors on May 7; it consisted of unclassified versions of Respondents' a) motion; b) brief; c) Declaration of James W. McJunkin, Federal Bureau of Investigation, Assistant Director for Counterterrorism, and d) Declaration II of Officer, DoD Security Classification / Declassification Review Team, in addition to those portions of Respondents' filing that had originally been unclassified and provided to the Press Intervenors via the Court's Electronic Case Filing ("ECF") system as exhibits to Respondents' Notice of Filing on April 14 (08mc442, Dkt # 1942). Press Intervenors filed their opposition on May 3 without waiting for the unclassified version of Respondents' papers. Respondents' counsel have communicated to counsel for Press Intervenors that Respondents would not oppose the submission by Press Intervenors of a supplemental response by June 3, when the Petitioners' consolidated response is due, but Press Intervenors counsel have indicated that Press Intervenors do not intend to file a supplemental response.

2010. Counsel for Press Intervenors indicated that Press Intervenors take no position with regard to Respondents' requested relief but they wish to note that they continue to object generally to delay in the process associated with the filing of public returns.

For the above stated reasons, the Court should grant Respondents' Unopposed Motion to File a Consolidated Reply and for an Extension of Time to Reply to the Responses of Petitioners and Press Intervenors.

Dated: May 12, 2010

Respectfully submitted,

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