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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE:  GUANTANAMO BAY DETAINEE LITIGATION	: Misc. No. 08-442 (TFH) : : Civil Action No. 05-1509 (RMU) : Civil Action No. 05-1602 (RMU) : Civil Action No. 05-1704 (RMU) : Civil Action No. 05-2386 (RMU)
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**PETITIONERS' MOTION FOR TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

Petitioners are six Uighur men imprisoned at Guantanamo Bay Naval Station, Cuba (“JTF-GTMO”)<sup>1</sup>. Petitioners hereby move for a temporary restraining order and a preliminary injunction pending resolution of these *habeas* petitions, restraining and enjoining Respondents from detaining Petitioners in any but the least restrictive camp within the JTF-GTMO, without limitation, and precluding further imprisonment in the solitary confinement cells of Camps 5 and 6, or any condition of partial or total isolation. In support of this motion, Petitioners rely on the Statement of Points and Authorities in Support of Petitioners’ Motion for Temporary Restraining Order and Preliminary Injunction, filed herewith.

Pursuant to Local Rule 7(m), counsel states that she has contacted Respondent’s counsel and has been advised that Respondent does not consent to this motion.

As the prisoners are destitute, the Court should waive any requirement for a bond.

A grant of the relief requested herein lies within the sound discretion of the Court.

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<sup>1</sup> The Uighur Petitioners herein are Hammad Memet and Khalid Ali in *Kiyemba v. Bush*, Civil Action No. 05-1509 (RMU), Petitioner Edham Mamet in *Mamet v. Bush*, Civil Action No. 05-1602 (RMU), Petitioners Bahtiyar Mahnut and Arkin Mahmud in *Kabir v. Bush*, Civil Action No. 05-1704 (RMU), and Petitioner Adel Noori in *Mohammon v. Bush*, Civil Action No. 05-2386 (RMU).

**WHEREFORE**, Petitioners pray:

1. For an immediate hearing on this motion;
2. For an order temporarily restraining, and then preliminarily enjoining

Respondents from holding them in any prison compound other than Camp 4 of JTF-GTMO, and from holding them under any conditions of isolation or solitary confinement; and

3. In the alternative to the relief requested in paragraph 2, above, Petitioners request that the Court order Respondents to notify the Court whether they will voluntarily consent to the relief set forth in paragraph 2, and in the event they will not, that the Court order the Petitioners transported to the Court, where they shall appear and appropriate conditions of confinement, if any, shall be imposed pending final disposition of their *habeas* petitions.

4. Petitioners request such other and further relief as may be just and proper.

Dated: July 26, 2008

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