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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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IN RE:	:	Misc. No. 08-442 (TFH)
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GUANTÁNAMO BAY	:	Civil Action Nos.
DETAINEE LITIGATION	:	
	:	06-CV-1690, 08-CV-1207, 08-CV-1360
	:	
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CONSENT MOTION FOR EXTENSION OF TIME

Petitioners in the above-captioned habeas cases respectfully move for an extension of time to comply with the Court's August 19, 2008 Order (misc. dkt. no. 268), requiring them to respond by August 29, 2008, to the government's proposed TS//SCI protective order. Petitioners request an extension of time until September 12, 2008. The government consents.

Good cause exists to grant this motion. A two-week extension is necessary to permit the parties to address the conditions under which Petitioners may prepare and file their response. As set forth in the parties' joint status report (misc. dkt. no. 170, § A.2.b), there are several issues that must be resolved before briefing and argument may proceed, including: (1) whether Petitioners may disclose presumptively classified TS//SCI information to the Court in their briefs and arguments; (2) whether security-cleared counsel for Petitioners may share presumptively TS//SCI information among themselves in order to make a single coordinated presentation to the Court; and (3) whether an emergency status conference with the Court may be necessary to address any unresolved issues prior to briefing. An extension of time will ensure that the Court has the benefit of all relevant arguments and information bearing on counsel access in these

cases, which is particularly important in the case of Petitioner Abd Al-Rahim Al-Nashiri, who has been charged by military commission with capital offenses.

An extension of time is also necessary because Petitioner Al-Nashiri's counsel are currently involved in briefing in another capital case, and thus are unable to respond to the government's proposed protective order by August 29, 2008. Petitioner Muhammad Husayn is likewise represented by two security-cleared counsel, one of whom was traveling for depositions this week and will be in Guantánamo next week, and the other of whom was traveling this week and is litigating other emergency motions in the case, which are presently before the Court.

Accordingly, this motion should be granted.

Date: New York, New York
August 22, 2008

Respectfully submitted,

Counsel for Petitioner Majid Khan*:

/s/ J. Wells Dixon

J. Wells Dixon (Pursuant to LCvR 83.2(g))
Gitanjali S. Gutierrez (Pursuant to LCvR 83.2(g))
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* This motion is filed, with consent, on behalf of Petitioners in the above-captioned habeas cases.

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2008, I caused the foregoing motion for extension of time to be served on counsel listed below by filing it on the public record through ECF, with prior approval from the Court Security Office.

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Counsel for Respondents

/s/ J. Wells Dixon
J. Wells Dixon