

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

IN RE:

**GUANTANAMO BAY
DETAINEE LITIGATION**

)
)
) **Misc. No. 08-0442 (TFH)**

)
) **Civil Action Nos.**

)
) **05-2104 (RBW), 05-1983 (RMU)**

UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to the Court's Order of July 29, 2008, Petitioners Ali Hamza Ahmed Suliman Bahloul, ISN 039, Othman Ali Mohammed Al Shamrany, ISN 171, and Ismael Ali Farag Al Bakush, ISN 708 ("Petitioners"), through their undersigned counsel, respectfully request a one month extension of time, until October 29, 2008, to file authorizations or counsel's declaration regarding the representation.

1. The Court has ordered filing of authorizations or counsel's declaration regarding the representation of Petitioners by September 29, 2008.

2. The undersigned counsel has already filed executed authorization forms for two clients, Ahmed Hussein, ISN 690, and Issam Al Jayfi, ISN 183. Counsel has not yet obtained executed authorization statements for Petitioners Bakush, Shamrany, and Bahloul.

3. Petitioners' counsel is visiting Guantanamo Bay Naval Station ("GTMO") the week of September 22, 2008, and has scheduled meetings with Petitioners Bakush and Shamrany. Assuming those meetings go forward as scheduled, counsel will seek to obtain executed authorizations from both detainees.

4. Given that those signed authorizations must be submitted to the Department of Defense for classification review at the conclusion of counsel's visit to the base (a process which

can take two weeks or longer), counsel will not be in a position to file any such authorizations on or before September 29. To allow for adequate time to obtain cleared authorizations, counsel requests a thirty-day extension of the time in which to file authorizations for these two detainees. Upon receipt of the declassified authorizations, counsel will promptly file them with the Court.

5. Counsel is authorized to represent Mr. Bahloul (and the other detainees referenced herein) pursuant to the “next friend” provision of the federal habeas statute. Moreover, as counsel has previously notified the Court, Mr. Bahloul has been charged by military commission and has been assigned military defense counsel. During next week’s visit to the base, counsel expects to meet with Mr. Bahloul’s military defense counsel concerning, among other matters, the status of our authorization to represent Mr. Bahloul in his habeas corpus action. With the benefit of this information, counsel will be able to update the court on the status of its authorization to represent Mr. Bahloul. We therefore request a thirty-day extension of the time to report to the court with respect to Mr. Bahloul.

Dated: September 19, 2008

Respectfully submitted,

/S/

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