

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
IN RE:)	
)	
GUANTANAMO BAY)	Misc. No. 08-0442 (TFH)
DETAINEE LITIGATION)	
)	
_____)	
AMER MOHAMMON, <i>et al.</i> ,)	
)	
Petitioners,)	
v.)	Civil Action No: 05-2386 (RBW)
)	
GEORGE W. BUSH, <i>et al.</i> ,)	
)	
Respondents.)	
_____)	
SHAKHRUKH HAMIDUVA, <i>et al.</i> ,)	
)	
Petitioners,)	
v.)	Civil Action No: 08-1221 (CKK)
)	
GEORGE W. BUSH, <i>et al.</i> ,)	
)	
Respondents.)	
_____)	

NOTICE OF FILING MEMORANDA OF UNDERSTANDING
AND ACKNOWLEDGMENTS

Attached to this notice are executed Memoranda of Understanding and executed Acknowledgments, which are derived from the exhibits to the Court’s Order of September 11, 2008, entitled “Protective Order and Procedures for Counsel Access to Detainees at the United States Naval Base in Guantanamo Bay, Cuba.”

Dated: September 23, 2008.

Respectfully submitted.

/s/ A. Stephens Clay IV
A. Stephens Clay, IV
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
sclay@kilpatrickstockton.com

*Counsel for Petitioners Shakhrukh Hamidova
(ISN 22); Ali Sher Hamidullah (ISN 455); and
Sharaf al Sanani (ISN 170)*

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

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IN RE:)		
)	Misc. No.	08-0442 (TFH)
GUANTANAMO BAY)		
DETAINEE LITIGATION)	Civil Action Nos:	05-2386 (RBW)
)		08-1221 (CKK)
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**MEMORANDUM OF UNDERSTANDING REGARDING ACCESS TO
CLASSIFIED NATIONAL SECURITY INFORMATION**

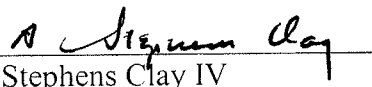
Having familiarized myself with the applicable statutes, regulations, and orders related to, but not limited to, unauthorized disclosure of classified information, espionage and related offenses; The Intelligence Identities Protection Act, 50 U.S.C. § 421; 18 U.S.C. § 641; 50 U.S.C. § 783; 28 C.F.R. § 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.

DATED: September 23, 2008

BY: A. Stephens Clay, IV
(type or print name)

SIGNED: 
A. Stephens Clay IV
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
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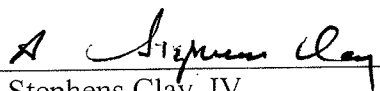
*Counsel for Petitioners Shakhrukh
Hamiduva (ISN 22); Ali Sher
Hamidullah (ISN 455); and
Sharaf al Sanani (ISN 170)*

ACKNOWLEDGMENT

The undersigned hereby acknowledges that he has read the Protective Order first entered on September 11, 2008, in the United States District Court for the District of Columbia in the consolidated cases captioned *In Re Guantanamo Bay Detainee Litigation*, No. 08-mc-0442, understands its terms, and agrees to be bound by each of those terms. Specifically, and without limitation, the undersigned agrees not to use or disclose any protected information or documents made available to him other than as provided by the Protective Order. The undersigned acknowledges that his duties under the Protective Order shall survive the termination of this case and are permanently binding, and that failure to comply with the terms of the Protective Order may result in the imposition of sanctions by the Court.

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*Counsel for Petitioners Shakhrukh
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Hamidullah (ISN 455); and
Sharaf al Sanani (ISN 170)*

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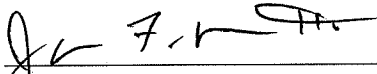
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DATED: September 23, 2008

BY: James F. Bogan, III
(type or print name)

SIGNED: 
James F. Bogan, III
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
jbogan@kilpatrickstockton.com

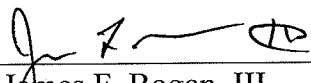
Counsel for Petitioners
Shakhrukh Hamiduva (ISN 22);
Ali Sher Hamidullah (ISN 455);
and Sharaf al Sanani (ISN 170)

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(type or print name)

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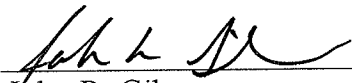
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DATED: September 23, 2008

BY: John R. Gibson
(type or print name)

SIGNED: 
John R. Gibson
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
jogibson@kilpatrickstockton.com

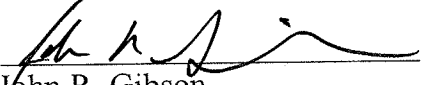
*Counsel for Petitioners Shakhrukh
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jogibson@kilpatrickstockton.com

*Counsel for Petitioners Shakhrukh
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DATED: September 16, 2008

BY: Daniel G. Schulof
(type or print name)

SIGNED: 

Daniel G. Schulof
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
dschulof@kilpatrickstockton.com

*Counsel for Petitioners Shakhrukh
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Hamidullah (ISN 455); and
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DATED: September 23, 2008

BY: Daniel G. Schulof
(type or print name)

SIGNED: 

Daniel G. Schulof
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
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dschulof@kilpatrickstockton.com

*Counsel for Petitioners Shakhrukh
Hamiduva (ISN 22); Ali Sher
Hamidullah (ISN 455); and
Sharaf al Sanani (ISN 170)*

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2008, I caused the foregoing “Notice of Filing Memoranda of Understanding and Acknowledgments” to be filed and served electronically to the counsel of record in the above-captioned matter via the CM/ECF system and to be filed and served upon counsel listed below by depositing a copy of same in the U.S. Mail, in an envelope with adequate postage affixed thereon, addressed to:

Andrew I. Warden
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue NW
Washington, D.C. 20530

Terry Marcus Henry
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue NW
Washington, D.C. 20530

/s/ A. Stephens Clay IV
A. Stephens Clay, IV
KILPATRICK STOCKTON LLP
1100 Peachtree St., Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
sclay@kilpatrickstockton.com

*Counsel for Petitioners Shakhrukh
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