

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

MOTAI SAIB, <i>et al.</i> ,)	
)	
Petitioners/Plaintiffs,)	Misc. No. 08-0442 (THF)
)	
v.)	Civil No. 05-CV-1353 (RMC)
)	
GEORGE W. BUSH, <i>et al.</i> ,)	
)	
Respondents/Defendants.)	
)	

NOTICE OF FILING MOTION TO SEAL AND EMERGENCY MOTION

Please take notice that, pursuant to the Protective Orders entered in this case, Petitioner Motai Saib (“Petitioner”), by and through his counsel, filed a Motion to Seal and an Emergency Motion with the Clerk of this Court via UPS OVERNIGHT on September 23, 2008.

Dated: September 23, 2008

Respectfully submitted,

s/ Meghan N. Winokur

Anne J. Castle
Scott S. Barker
J. Triplett Mackintosh
William E. Murane
Danielle R. Voorhees
Meghan N. Winokur
HOLLAND & HART LLP
555 Seventeenth Street, Suite 3200
Denver, CO 80202
Telephone: (303) 295-8000
Facsimile: (303) 295-8261

Of Counsel
Shayana Kadidal
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Telephone: (212) 614-6438
Facsimile: (212) 614-6499

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2008, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to the following:

Joseph H. Hunt
Vincent M. Garvey
Judry L. Subar
Terry M. Henry
Andrew I. Warden
Paul Ahern
Robert J. Prince
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., NW
Washington, DC 20530

s/ Lisa M. Podsiadlik _____
Holland & Hart LLP