

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GUANTANAMO BAY
DETAINEE LITIGATION

Misc. No. 08-442 (TFH)

Civ. Action No.
08-CV-0987

NOTICE OF MEMORANDUM OF UNDERSTANDING REGARDING ACCESS TO
CLASSIFIED NATIONAL SECURITY INFORMATION
AND ACKNOWLEDGEMENT

Pursuant to Judge Hogan's Order of July 29, 2008, entering in Petitioner Dokhan's case the Protective Order, which refers collectively to (1) the Amended Protective Order and Procedures for Counsel Access to Detainees at the United States Naval Base in Guantanamo Bay, Cuba, first issued on November 8, 2004, 344 F. Supp. 2d 174 (D.D.C. 2004); (2) the Order Addressing Designation Procedures for Protected Information, first issued on November 10, 2004; and (3) the Order Supplementing and Amending Filing Procedures Contained in the November 8, 2004 Amended Protective Order, first issued on December 13, 2004, counsel for Petitioner Dokhan submits to this Court her signed Memorandum of Understanding Regarding Access to Classified National Security Information and Acknowledgement.

Dated: August 29, 2008

Respectfully submitted,

Counsel for Petitioner Dokhan
(08-cv-987)

/s/ Kristine A. Huskey
Kristine A. Huskey

D.C. Bar #462979
National Security & Human Rights Clinic
University of Texas School of Law
727 East Dean Keeton St.
Austin, TX 78705
Tel: 512-232-3657
Fax: 512-232-0800

Shayana D. Kadidal
D.C. Bar ID #454248
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, New York 10012
Tel: 212-614-6438
Fax: 212-614-6499

CERTIFICATE OF SERVICE

I, Eddie Maraboto, hereby certify that I today caused a true and accurate copy of the NOTICE OF MEMORANDUM AND ACKNOWLEDGEMENT to be served electronically via the Court's Electronic Case Filing system, which will send notification of such filings to all counsel of record.

/s/ Eddie Maraboto
Eddie Maraboto

Dated: August 29, 2008

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

, et al.)	
)	
Petitioners,)	
)	
v.)	Civil Action No.
)	
GEORGE W. BUSH,)	
President of the United)	
States, et al.,)	
)	
Respondents.)	

**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

EXHIBIT B

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 case captioned Dokhan v. George W. Bush, No. 08-0987

(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 case captioned Dokhan v. George W. Bush, No. 08-0987, and I agree to comply with the provisions thereof.

KRISTINE A. HUSKEY

Date

Kristine A. Huskey

Aug-29-2008
Date

EXHIBIT C

ACKNOWLEDGMENT

The undersigned hereby acknowledges that he/she has read the Protective Order entered in the United States District Court for the District of Columbia in the case captioned Dokhan v. George W. Bush, No. 08-0987, 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/her other than as provided by the Protective Order. The undersigned acknowledges that his/her 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.

DATED: Aug 29, 2008 BY: KRISTINE A. MUSKEY
(type or print name)

SIGNED: Kristine A. Muskey