

Cleared for Public Filing, 7/17/08

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

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IN RE:	:	
	:	
GUANTÁNAMO BAY	:	Misc. No. 08-442 (TFH)
DETAINEE LITIGATION	:	
	:	
_____	X	
	:	
MOHAMMED SULAYMON BARRE,	:	
	:	
Petitioner,	:	
	:	
v.	:	Civil Action No. 08 CV 1153 (HHK)
	:	
GEORGE W. BUSH, <i>et al.</i> ,	:	
	:	
Respondents.	:	
	:	
_____	X	

MOTION FOR ENTRY OF PROTECTIVE ORDER ON CONSENT

Petitioner Mohammed Sulaymon Barre (“Petitioner”), by and through his undersigned counsel, and with Respondents’ consent, respectfully moves this Court for entry of the protective order first entered by Judge Green in the *In re Guantánamo Detainee Cases*, 344 F. Supp. 2d 174 (D.D.C. 2004).

Respondents now consent to entry of the protective order and supplemental orders, *i.e.*, (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 November 8, 2004 Amended Protective Order, first issued on December 13, 2004. Respondents state that they reserve the right to seek modifications to the protective order and supplemental orders as appropriate, and their consent to entry of the orders is without prejudice to such right.

WHEREFORE, Petitioner respectfully requests that this Court enter the protective order in this case.

Dated: New York, New York
July 15, 2008

Respectfully submitted,

Counsel for Petitioner:

/s/ Emilou MacLean
Emilou MacLean (Pursuant to LCvR 83.2(g))
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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2008, I caused the forgoing Motion for Entry of Protective Order on Consent to be filed and served on counsel listed below by causing an original and two copies to be delivered to the Court Security Office via overnight mail.

Terry M. Henry
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/s/

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