

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

IN RE :

**GUANTÁNAMO BAY
DETAINEE LITIGATION**

Misc. No. 08-442 (TFH)

**ABDULLAH WAZIR ZADRAN, et al.
Petitioners/Plaintiffs,**

Civil No. 05-CV-2367 (RWR)

v.

**GEORGE W. BUSH, et al.,
Respondents/Defendants.**

**MOTION ON CONSENT FOR EXTENSION OF TIME TO RESPOND TO
RESPONDENTS' MOTIONS FOR LEAVE TO FILE AMENDED FACTUAL RETURN**

Petitioners Mohammad Wabi (“Petitioner Omari”) and Mohammed Zahir (“Petitioner Zahir”), by and through their undersigned counsel, hereby request an extension of time to respond to Respondents’ Motions for Leave to File Amended Factual Return and state as follows:

1. On October 24, 2008, Respondents filed a Motion for Leave to File Amended Factual Return (Docket No. 802) pertaining to Petitioner Omari. Petitioner Omari’s response to this motion is currently due by November 7, 2008.

2. On October 29, 2008, Respondents filed a substantially identical Motion for Leave to File Amended Factual Return (Docket No. 857), this one pertaining, inter alia, to Petitioner Zahir. Petitioner Zahir’s response to this motion is currently due by November 12, 2008.

3. Respondents' motions raise important issues relating to the evidence properly before this Court connection with Petitioners Omari's and Zahir's habeas petitions. Petitioners Omari and Zahir require additional time to adequately respond to the matters raised in the motions.

4. Counsel for Petitioners Omari and Zahir request an extension until November 21, 2008, to file their response to both of Respondents' motions for leave to amend.

5. Counsel for Petitioners Omari and Zahir has conferred with counsel for Respondents. Counsel for Respondents does not oppose the requested extension.

WHEREFORE, Petitioners Omari and Zahir respectfully request that the Court grant them an extension of time until November 21, 2008, in which to respond to Respondents' two Motions for Leave to File Amended Factual Return. A proposed order is attached.

Respectfully submitted,

Dated: November 6, 2008

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Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November, 2008, I caused the foregoing Motion on Consent for Extension of Time to Respond to Respondents' Motions for Leave to File Amended Factual Return and Proposed Order to be filed with the Court and served via e-mail on counsel for Respondents as follows:

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