



2. The Protective Order further provides, “Without authorization from the government or the Court, protected information shall not be disclosed or distributed to any person or entity other than... petitioners’ counsel, provided such individuals have signed the Acknowledgement, attached hereto as Exhibit C, attesting to the fact that they have read this Protective Order and agree to be bound by its terms...” *Id.* ¶ 35 (a).

3. The Protective Order defines “petitioners’ counsel” to include “an attorney who is employed or retained by or on behalf of a petitioner for purposes of representing the petitioner in habeas corpus or other litigation in federal court in the United States, as well as co-counsel, interpreters, paralegals, investigators and *all other personnel* or support staff employed or engaged to assist in the litigation.” *Id.* ¶ 11 (emphasis added).

4. Elaine Lou is a legal intern at Lincoln Square Legal Services. She is an integral member of the legal team supervised by Martha Rayner, representing several clients imprisoned at Guantánamo Bay. Ms. Lou has security clearance status. In order to accompany Ms. Rayner on visits with clients at Guantánamo and access classified information concerning clients, the Protective Order entered in this case requires that Ms. Lou file an executed Memorandum of Understanding Regarding Access to National Security Information is attached here as Exhibit A.

Dated: New York, New York  
November 13, 2008

Respectfully submitted,

Counsel for Petitioner:

\_\_\_\_\_/s/\_\_\_\_\_  
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# **Exhibit A**



the United States District Court for the District of Columbia in the case captioned *Mohammon v Bush*, No. 04-cv-2249.

(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 Judge Thomas F. Hogan on September 11, 2008 in the United States District Court for the District of Columbia in the case *Mohammon v. Bush*, No. 05-cv-2249, and I agree to comply with the provisions thereof.

\_\_\_\_\_/s/\_\_\_\_\_  
Elaine Lou

November 13, 2008  
Date