UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

TALAL AL-ZAHRANI, *et al.*,

                Plaintiffs,

       v.

DONALD RUMSFELD, *et al*.

and

UNITED STATES,

                Defendants.

Case No. 09-cv-00028 (ESH)

**UNOPPOSED MOTION FOR A ONE-WEEK EXTENSION OF TIME FOR
PLAINTIFFS' REPLY TO DEFENDANTS' OPPOSITIONS TO
PLAINTIFFS' MOTIONS FOR RECONSIDERATION AND FOR LEAVE TO AMEND**

Plaintiffs Talal Al-Zahrani and Ali Abdullah Ahmed Al-Salami ("Plaintiffs"), by and

through their counsel, respectfully request a one-week extension of time to reply to the

Individual Named Defendants' and the United States' (collectively, "Defendants") oppositions to

Plaintiffs' Motion for Reconsideration in Light of Newly Discovered Evidence and Motion for

Leave to Amend in Light of Newly Discovered Evidence, filed March 16, 2010 (dkt. nos. 27,

28). In support of their motion, Plaintiffs state the following:

1.   Plaintiffs are the fathers of Yasser Al-Zahrani and Salah Ali Abdullah Ahmed Al-

Salami, two detainees who died at Guantánamo in June 2006. Plaintiffs filed a complaint in their

individual capacities and on behalf of their sons against Defendants on January 7, 2009, raising

claims under the Fifth and Eighth Amendments to the Constitution, the Alien Tort Claims Act,

and the Federal Tort Claims Act, which they amended on January 29, 2009. On June 26, 2009,

Defendants moved to substitute and dismiss Plaintiffs' claims. Briefing was completed by December 4, 2009, and the Court granted Defendants' motions and dismissed Plaintiffs' claims on February 16, 2010.

2. On March 16, 2010, Plaintiffs filed a motion for reconsideration on the basis of newly-discovered evidence concerning the cause and circumstances of Al-Zahrani and Al-Salami's deaths, as well as a motion for leave to amend their complaint in light of that evidence. In their proposed amended complaint, Plaintiffs raised several new claims, including claims under 42 USC §§ 1985 (2) and (3), which have not previously been briefed or addressed by the parties or the Court in this action.

3. On March 17, 2010, Defendants moved for a 16-day extension of time to respond to Plaintiffs' motions, which Plaintiffs did not oppose. Defendants' filed their oppositions to Plaintiffs' motions on April 15, 2010.

4. Plaintiffs' reply to Defendants' oppositions is currently due April 26, 2010. Given the number of issues to address and the extension permitted for Defendants' response, Plaintiffs request a one-week extension of time, until and including May 3, 2010, to file their reply.

5. Pursuant to Local Rule 7(m), Plaintiffs' counsel have conferred with Defendants' counsel about this motion. Defendants do not oppose.

6. This motion is made in good faith and not for the purposes of delay.

7. Plaintiffs have not previously requested nor been granted an extension of time with respect to their motions for reconsideration and for leave to amend.

8. There are no other previously scheduled deadlines in this case.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant their motion.

Dated: April 19, 2010   Respectfully submitted,

                                       /s/ Pardiss Kebriaei

Pardiss Kebriaei (Pursuant to LCvR 83.2(g))
William Goodman (Pursuant to LCvR 83.2(g))
Shayana Kadidal (D.C. Bar No. 454248)
Joshua M. Rosenthal (Pursuant to LCvR 83.2(g))
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel: (212) 614-6452
Fax: (212) 614-6499
pkebriaei@ccrjustice.org

Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

TALAL AL-ZAHRANI, *et al.*,

                Plaintiffs,

        v.

DONALD RUMSFELD, *et al.*

and

UNITED STATES,

                Defendants.

Case No. 09-cv-00028 (ESH)

[PROPOSED] ORDER

Upon consideration of the Unopposed Motion for a One-Week Extension of Time

for Plaintiffs' Reply to Defendants' Oppositions to Plaintiffs' Motions for

Reconsideration and For Leave to Amend, it is hereby ORDERED that the Motion is

GRANTED. Plaintiffs shall file their reply on or before May 3, 2010.

SIGNED this _____ day of _____, 2010.

                               _____
                               Ellen S. Huvelle
                               United States District Judge