

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SUHAIL NAJIM ABDULLAH
AL SHIMARI, et al.,
Plaintiffs,
v.
CACI INTERNATIONAL INC, et al.,
Defendants.
Case No. 1:08-CV-00827-GBL-JFA

CACI DEFENDANTS' MOTION FOR LEAVE TO FILE ADDITIONAL
MATERIAL IN SUPPORT OF THEIR MOTION TO STAY DISCOVERY

Defendants CACI International Inc and CACI Premier Technology, Inc. (collectively, the
"CACI Defendants") respectfully request leave to file with the Court a copy of the recently-
promulgated Department of Defense Directive No. 3115.09 (October 9, 2008)1 in support of the
CACI Defendants' Motion to Stay Discovery. This Directive, governing interrogations and the
protection of interrogation-related information, was issued and effective on October 9, 2008; the
CACI Defendants learned of its existence on October 15, 2008. Because this Defense
Department Directive addresses a core issue raised in the CACI Defendants' Motion to Stay
Discovery, allowing the CACI Defendants to file this Directive will give the Court a more
complete picture of the Defense Department's position on the availability of interrogation-related
materials in discovery. The bases for the CACI Defendants' motion are set forth in greater detail
in the accompanying memorandum.

1 A copy of Department of Defense Directive No. 3115.09 is attached as Exhibit A to the
CACI Defendants' supporting Memorandum.

Wherefore, the CACI Defendants respectfully request that the Court grant this Motion and deem Exhibit A to the CACI Defendants' supporting memorandum as filed in support of the CACI Defendants' Motion to Stay Discovery. A proposed order is attached.²

Respectfully submitted,

/s/ J. William Koegel, Jr.

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October 17, 2008

² Counsel for the CACI Defendants conferred with Plaintiffs' counsel concerning the subject of this motion. Through no fault of their own, Plaintiffs' counsel were unable to provide a substantive response to the CACI Defendants' request for consent to this motion. That the hearing on the CACI Defendants' Motion to Stay Discovery is set for October 24, 2008 necessitated the filing of this motion without further delay.

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of October, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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