

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DAVID M. HICKS,

Petitioner,

v.

GEORGE W. BUSH,

President of the United States,
et al.,

Respondents.

Civil Action No. 02-CV-0299 (CKK)

FAWZI KHALID ABDULLAH FAHAD
AL ODAH, *et al.*

Plaintiffs,

v.

UNITED STATES OF AMERICA,
et al.,

Defendants.

Civil Action No. 02-CV-0828 (CKK)

MAMDOUH HABIB, *et al.*

Petitioners,

v.

GEORGE WALKER BUSH,

President of the United States,
et al.,

Respondents.

Civil Action No. 02-CV-1130 (CKK)

)	
MURAT KURNAZ, <i>et al.</i>)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 04-CV-1135 (ESH)
)	
GEORGE W. BUSH,)	
President of the United States,)	
<i>et al.</i> ,)	
)	
Respondents.)	
)	
)	
O.K., <i>et al.</i>)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 04-CV-1136 (JDB)
)	
GEORGE W. BUSH,)	
President of the United States,)	
<i>et al.</i> ,)	
)	
Respondents.)	
)	
)	
MOAZZAM BEGG, <i>et al.</i>)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 04-CV-1137 (RMC)
)	
GEORGE W. BUSH,)	
President of the United States,)	
<i>et al.</i> ,)	
)	
Respondents.)	
)	

RIDOUANE KHALID, *et al.*

Petitioners,

v.

GEORGE W. BUSH,
President of the United States,
et al.,

Respondents.

Civil Action No. 04-CV-1142 (RJL)

JAMIL EL-BANNA, *et al.*

Petitioners,

v.

GEORGE W. BUSH,
President of the United States,
et al.,

Respondents.

Civil Action No. 04-CV-1144 (RWR)

FALEN GHEREBI, *et al.*

Petitioners,

v.

GEORGE WALKER BUSH,

et al.,

Respondents.

Civil Action No. 04-CV-1164 (RBW)

LAKHDAR BOUMEDIENE, *et al.*

Petitioners,

v.

GEORGE WALKER BUSH,
President of the United States,
et al.,

Respondents.

Civil Action No. 04-CV-1166 (RJL)

SUHAIL ABDUL ANAM, *et al.*

Petitioners,

v.

GEORGE W. BUSH,
President of the United States,
et al.,

Respondents.

Civil Action No. 04-CV-1194 (HHK)

ISA ALI ABDULLA ALMURBATI, *et al.*

Petitioners,

v.

GEORGE WALKER BUSH,
President of the United States,
et al.,

Respondents.

Civil Action No. 04-CV-1227 (RBW)

MAHMOAD ABDAH, <i>et al.</i>)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 04-CV-1254 (HHK)
)	
GEORGE W. BUSH,)	
President of the United States,)	
<i>et al.</i> ,)	
)	
Respondents.)	
<hr/>		
SALIM AHMED HAMDAN,)	
)	
Petitioner,)	
)	
v.)	Civil Action No. 04-CV-1510 (JR)
)	
DONALD RUMSFELD,)	
Secretary of Defense,)	
<i>et al.</i> ,)	
)	
Respondents.)	
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**JOINT MOTION FOR AN ENLARGEMENT OF TIME TO FILE SUBMISSIONS
REGARDING THE PROPOSED PROTECTIVE ORDER¹**

COME NOW, the parties in the above referenced cases and jointly move this Court for an enlargement of time to provide this Court with its memoranda detailing the points of disagreement for the proposed protective order.

On Friday, September 24, 2004, respondents provided a proposed protective order to petitioners via e-mail. On October 3, 2004, petitioners sent a letter to respondents objecting to

¹ Counsel for the undersigned petitioners attempted to contact petitioners' counsel in the Hicks and Gherebi cases regarding this joint motion, but were unsuccessful. Counsel for the undersigned petitioners note that they heard no objection from these counsel regarding the relief requested herein.

the protective order and proposing a meet and confer to discuss issues raised by the protective order in an effort to reach resolution. That meet and confer took place on October 6, 2004. At that meeting the parties engaged in extensive discussions concerning significant issues surrounding the protective order. Also at the meeting, petitioners indicated they would provide respondents a detailed written response with points of disagreement and items for clarification. It is anticipated this response will be provided to respondents on Friday, October 8, 2004. Petitioners are providing this response with the intent that the parties might be able to come to agreement on portions of the protective order, narrow the areas of disagreement on others and provide clarification on the protective order procedures.

In order to accomplish this, the parties will need an enlargement of time to provide written submissions regarding the protective order beyond the October 7, 2004 date set by the Court pursuant to the Court's September 20, 2004 Order Setting Status Conference, Briefing Schedule for Protective Order, and for Notification of Released Detainees. This will allow respondents time to review, assess and respond to petitioners' proposal. Therefore, the parties seek an enlargement of time to Tuesday, October 12, 2004 to file written submissions regarding the status of the protective order, and, therefore, respectfully request this Court to grant the parties' joint motion for an enlargement of time. A proposed Order is attached.

Dated: October 7, 2004

Respectfully submitted,

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