

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RIDOUANE KHALID, *et al.*,

Petitioners,

v.

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

Respondents.

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

LAKHDAR BOUMEDIENE, *et al.*

Petitioners,

v.

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

Respondents.

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

**NOTICE OF SUBMISSION OF FACTUAL RETURNS TO
PETITIONS FOR WRIT OF HABEAS CORPUS UNDER SEAL
CONSISTENT WITH JUDGE GREEN'S DECEMBER 8, 2004 ORDER
IN THE COORDINATED CASES**

Notice is hereby given that respondents have submitted under seal, as explained herein, factual returns to the petitions for writ of habeas corpus in the above-captioned cases. Consistent with various orders of Judge Green, these factual returns were previously submitted *in camera* to Judge Green when these cases were coordinated with the other Guantanamo Bay detainee cases. In addition, versions of these factual returns, redacting any classified information not suitable for disclosure to petitioners' counsel, were previously provided to petitioners' counsel in the secure

facility established for these cases.¹ On December 8, 2004, Judge Green issued an Order for Specific Disclosures Relating to Respondents' Motion to Designate as "Protected Information" Unclassified Information and Petitioners' Motion for Access to Unredacted Factual Returns in the remaining coordinated cases, which is attached hereto. For the Court's convenience, respondents are submitting highlighted versions of the factual returns previously submitted, consistent with Judge Green's Order, as explained therein, through the Court Security Officer for *in camera* review by this Court and for review by petitioners' counsel in the secure facility.

Dated: December 17, 2004

Respectfully submitted,

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¹ The Combatant Status Review Tribunal for petitioner Belkacem Bensayah in the *Boumediene* case was recently reopened to consider newly discovered information regarding the enemy combatant status of this petitioner. Respondents are presently reviewing this supplemental information and preparing it for submission to the Court. Respondents anticipate filing a motion to supplement the factual return for petitioner Belkacem Bensayah with this additional information during the week of December 27, 2004.

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/s/ Preeya M. Noronha

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