IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

FAWZI KHALID ABDULLAH FAHAD et al.,)
Plaint	iffs,)
v.) No. CV 02-0828 (CKK)
UNITED STATES OF AMERICA, et al.,)
Defen	dants.
)

MOTION FOR EXPEDITED CONSIDERATION OF MOTION TO COMPEL RESPONSIVE PLEADING AND RETURN FORTHWITH

Plaintiffs move for expedited consideration of the Motion to Compel Responsive

Pleading and Return Forthwith, which they are filing simultaneously with this motion. For the
reasons given in the Motion to Compel, it is vital that the Court order the government to respond
forthwith to plaintiffs' amended complaint and make a return forthwith to plaintiffs' application
for writs of habeas corpus. For the same reason it is vital that the Court decide that Motion
expeditiously. Accordingly, plaintiffs request that the government be ordered to respond to the

Motion to Compel within three days, that plaintiffs have one day to reply, and that the Court rule on the Motion as soon thereafter as possible.

Respectfully submitted,

/s/ Neil Koslowe

Thomas B. Wilner (D.C. Bar #173807) Neil H. Koslowe (D.C. Bar #361792) Kristine A. Huskey (D.C. Bar #462979) Jared A. Goldstein (D.C. Bar #478572)

SHEARMAN & STERLING LLP 801 Pennsylvania Avenue, N.W. Washington, D.C. 20004 Telephone: (202) 508-8000

Facsimile: (202) 508-8100 Attorneys for Plaintiffs

Dated: August 27, 2004

1

In accordance with LCvR 7.1(m), counsel for plaintiffs consulted with counsel for defendants about the underlying Motion to Compel, and counsel for defendants advised that defendants will oppose that Motion. Counsel for plaintiffs assume defendants will oppose this related motion as well.