

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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)
MAHMOAD ABDAH, *et al.*,
Petitioners,
)

v.
)

GEORGE W. BUSH, *et al.*,
Respondents.
)
)

Civil Action No. 04-CV-1254 (HHK)

**NOTICE OF FILING AND SUMMARY OF MOTION FOR ORDER REQUIRING
RESPONDENTS TO PROVIDE COUNSEL FOR PETITIONERS AND THE COURT
WITH 30-DAYS' ADVANCE NOTICE OF ANY INTENDED REMOVAL OF
PETITIONERS FROM GUANTÁNAMO**

As required by the Amended Protective Order in this matter, undersigned counsel hereby gives notice that on March 1, 2005, a copy of a Motion for Order Requiring Respondents to Provide Counsel for Petitioners and the Court with 30-Days' Advance Notice of Any Intended Removal of Petitioners from Guantánamo was sent to Christine Gunning, Court Security Officer, for clearance for public filing.

The Motion asks the Court to enjoin Respondents or their agents from removing Petitioners from Guantánamo to a foreign territory without giving counsel and the Court 30-days' advance notice, in order to enable counsel to contest any such removal and preserve the jurisdiction of the Court in this matter.

The Motion will be filed via the Electronic Case Filing system when it has been cleared by the Court Security Office.

Dated: Washington, D.C.
March 1, 2005

Respectfully submitted,

COVINGTON & BURLING

/s/

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