

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

FAWZI KHALID ABDULLAH FAHAD AL ODAH,	)	
<i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. CV 02-0828 (CKK)
	)	
UNITED STATES OF AMERICA, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

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**RENEWED MOTION FOR PRELIMINARY INJUNCTION**

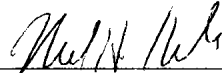
Fawzi Khalid Abdullah Fahad Al Odah, *et al.*, plaintiffs, for purposes of clarifying the record, renew the motion for a preliminary injunction entered in the docket of this case on May 9, 2002. The reasons for the original motion are set forth in the memorandum of points and authorities and exhibits that accompanied plaintiffs' original motion, and they are incorporated by reference to support this renewed motion. A proposed order is attached to this motion.

During the telephone conference call conducted by the Court with the parties on July 23, 2004, the Court directed defendants, among other things, to respond by July 30, 2004, to plaintiffs' underlying requests for relief, including access by counsel and family members to the plaintiff-detainees at the Guantanamo Bay Naval Base. Those requests were set forth in plaintiffs' motion for a preliminary injunction and the accompanying brief and exhibits entered in the docket on May 9, 2002. After the telephone conference call, the Court issued its Order of July 23, 2004, incorporating a briefing and hearing schedule and requiring defendants to respond to plaintiffs' "underlying petitions for writs of habeas corpus."

To ensure for the record that there is no misunderstanding regarding the submissions to which defendants must respond on July 30, 2004, and to ensure for the record that there is a

pending application for writs of habeas corpus on behalf of the plaintiff-detainees and a pending motion for a preliminary injunction seeking access to the plaintiff-detainees, plaintiffs now renew their motion for a preliminary injunction to which defendants never responded on the merits.<sup>1</sup> Plaintiffs today are also filing an application for writs of habeas corpus on behalf of the plaintiff-detainees.

Respectfully submitted,



Thomas B. Wilner (D.C. Bar #173807)

Neil H. Koslowe (D.C. Bar #361792)

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Attorneys for Plaintiffs

Dated: July 27, 2004

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<sup>1</sup> As the Court observed during the telephone conference call of July 23, 2004, instead of responding to the merits of that motion defendants successfully moved to dismiss it and plaintiffs' amended complaint for lack of jurisdiction.

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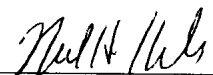
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	)	

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**APPLICATION FOR WRITS OF HABEAS CORPUS**

Fawzi Khalid Abdullah Fahad Al Odah, *et al.*, plaintiffs, for purposes of clarifying the record, apply under 28 U.S.C. §§ 2241-2243 for the issuance of writs of habeas corpus on behalf of those plaintiffs presently detained at Guantanamo Bay Naval Base. Alternatively, plaintiffs apply for the issuance of an order directing defendants to show cause on July 30, 2004, why the writs should not be granted. The reasons for this application are set forth in plaintiffs' amended complaint and motion for preliminary injunction entered in the docket on May 9, 2002.

Respectfully submitted,

  
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