UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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

MOTION FOR EXTENSION OF TIME TO RESPOND TO PETITIONERS' MOTION FOR WRIT OF INJUNCTION

Respondents hereby move for an extension of time until May 9, 2005, in which to respond to petitioners' Motion for Writ of Injunction.

In support of this motion, respondents submit the following:

- 1. On April 21, 2005, petitioners' filed a Motion for Writ of Injunction (dkt no. 233) with the Court Security Officers for Guantanamo Bay ("GTMO") habeas litigation. The motion seeks various injunctions against respondents based on alleged interference with the attorney-client relationship between petitioners and petitioners' counsel.
- 2. Pursuant to the Local Rules of the Court, respondents' opposition to the Motion for Writ of Injunction is due to be filed Monday, May 2, 2005. Respondents' seek a modest extension until May 9, 2005 in which to respond to the motion.
- 3. A one-week extension of time is warranted in this matter to address the numerous factintensive issues raised by the motion. Respondents are presently in the process of consulting

with Department of Defense personnel about the allegations raised in the motion and obtaining appropriate responsive declarations, but request additional time to complete these matters, including additional time to confer with personnel who have been on leave from GTMO this week. An extension of time is also warranted given that respondents' counsel are in the process of responding to and otherwise dealing with several other motions, including motions for preliminary injunctions, that have been filed before the various Judges of this Court in the GTMO habeas litigation in recent days.

5. For these reasons, respondents respectfully request that the Court extend until May 9, 2005, the time period during which respondents may respond to petitioners' Motion for Writ of Injunction.¹

A proposed order is attached.

Dated: April 29, 2005 Respectfully submitted,

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¹ Undersigned counsel for respondents has contacted petitioners' counsel, Kristine Huskey, who does not consent to the extension requested herein.

/s/ Andrew I. Warden

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