

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

*In re* **GUANTANAMO DETAINEE CASES**

) Civil Action Nos.: 02-CV-828 (CKK),  
) 02-CV-1130 (CKK), 04-CV-1136 (JDB),  
) 04-CV-1137 (RMC), 04-CV-1144 (RWR),  
) 04-CIV-1227 (RBW), 02-CV-0299(CKK),  
) 04-CV-2046 (CKK), 04-CV-2035 (GK),  
) 04-CV-1254 (HKK), 04-CV-1194 (HKK)  
)  
) **ORAL ARGUMENT REQUESTED**

**NOTICE OF FILING**

Petitioners give notice that today they submitted under seal to the Court Security Officer a **Reply to Respondents' Opposition to Motion for Leave to Take Discovery and For Preservation Order**. This Reply addresses the factual and legal arguments raised in Respondents' Opposition, and incorporates and supplements the points raised in Petitioners' Motion for Leave to Take Discovery and for Preservation Order. Petitioners continue to request that this Court grant them leave to discover and share with the Court documents and information relating to the torture, mistreatment, and abuse of the petitioners, in full and unredacted from, so that they may support their habeas claims that they are being imprisoned without lawful authority and are suffering inhumane treatment. Petitioners also continue to seek an order compelling respondents to preserve and maintain the documents and information petitioners seek leave to discover.

Respectfully submitted,

*Counsel for Al Odah, et al.*  
*Civil Action No. 02-CV-0828 (CKK)*

\_\_\_\_\_/s/ Neil H. 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

***Counsel for Mamdouh Habib, et al.***  
***Civil Action No. 02-CV-1130 (CKK)***

/s/

---

Joseph Margulies  
MacArthur Justice Center  
University of Chicago Law School  
1111 East 60<sup>th</sup> Street  
Chicago, IL 60637  
Tel: (773) 702-9560

Barbara Olshansky, to be admitted *pro hac vice*  
Jeffrey E. Fogel, to be admitted *pro hac vice*  
Michael Ratner, to be admitted *pro hac vice*  
Center for Constitutional Rights  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6439  
Fax: (212) 614-6499

***Counsel for Moazzam Begg, et al.***  
***Civil Action No. 04-CV-1137 (RMC)***

/s/

---

John J. Gibbons  
Lawrence S. Lustberg  
Gitanjali S. Gutierrez  
Gibbons, Del Deo, Dolan, Griffinger &  
Vecchione, P.C.  
One Riverfront Plaza  
Newark, New Jersey 07102  
Tel: 973-596-4493  
Fax: 973-639-6243

Barbara Olshansky, to be admitted *pro hac vice*  
Jeffrey E. Fogel, to be admitted *pro hac vice*  
Michael Ratner, to be admitted *pro hac vice*  
Shayana Kadidal

Center for Constitutional Rights  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6439  
Fax: (212) 614-6499

***Counsel for Jamil El-Banna, et al.***  
***Civil Action No. 04-CV-01144 (RWR)***

/s/

George Brent Mickum IV (D.C. Bar No. 396142)  
Douglas J. Behr (D.C. Bar No.163998)  
Keller and Heckman LLP  
1001 G Street, N.W., Suite 500W  
Washington, D.C. 20001  
Tel: (202) 434-4100  
Fax: (202) 434-4646

Barbara Olshansky, to be admitted *pro hac vice*  
Jeffrey E. Fogel, to be admitted *pro hac vice*  
Michael Ratner, to be admitted *pro hac vice*  
Center for Constitutional Rights  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6439  
Fax: (212) 614-6499

Joseph Margulies, to be admitted *pro hac vice*  
Margulies & Richman, PLC  
2520 Park Avenue, South  
Minneapolis, MN 55404  
Tel: (612) 872-4900  
Fax: (612) 872-4967

***Counsel for Isa Ali Abdulla Almurbati, et al.***  
***Civil Action No.: 04-CV-1227 (RBW)***

/s/

Stewart D. Aaron  
Joshua Colangelo-Bryan  
Dorsey & Whitney LLP  
250 Park Avenue  
New York, NY 10177-1500  
Tel: (212) 415-9200  
Fax: (212) 953-7201

Ralph A. Taylor Jr. (D.C. Bar No. 225219)

Dorsey & Whitney LLP  
Suite 400 South  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2533  
Tel: (202) 442-3000  
Fax: (202) 442-3199

***Counsel for Ahcene Zemiri***  
***Civil Action No. 04-CV-2046 (CKK)***

\_\_\_\_\_  
/s/

John W. Lundquist (MN # 65286 )  
James E. Dorsey (MN # 137893)  
FREDRIKSON & BYRON, P.A.  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402  
Tel: (612) 492-7000  
Fax: (612) 492-7077  
Barbara Olshansky (NY0057)  
CENTER FOR CONSTITUTIONAL RIGHTS  
666 Broadway, 7th Floor  
New York, New York 10012  
Tel: (212) 614-6439  
Fax: (212) 614-6499

***Counsel for Jarallah Al Marri et al.***  
***Civil Action No. 04-CV-2035 (GK)***

\_\_\_\_\_  
/s/

Lawrence S. Lustberg  
Mark A. Berman  
Jonathan L. Hafetz  
Gibbons, Del Deo, Dolan, Griffinger & Vecchione  
One Riverfront Plaza  
Newark, NJ 07102  
(973) 596-4500

***Counsel for Abdah, et al.,***  
***Civil Action No. 04-CV-1254 (HKK)***

\_\_\_\_\_  
/s/

David H. Remes (D.C. Bar No. 370782)  
Covington & Burling  
1201 Pennsylvania Ave., N.W.  
Washington, DC 20004  
202-662-5212 (tel)

202-778-5212 (fax)

Marc D. Falkoff, pro hac vice  
Covington & Burling  
1330 Avenue of the Americas  
New York, NY 10019  
212-841-1166 (tel)  
646-441-9166 (fax)

Barbara Olshansky, to be admitted *pro hac vice*  
Jeffrey E. Fogel, to be admitted *pro hac vice*  
Michael Ratner, to be admitted *pro hac vice*  
Center for Constitutional Rights  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6439  
Fax: (212) 614-6499

***Counsel for Anam, et al.,***  
***04-CV-1194 (HHK)***

\_\_\_\_\_  
/s/

Pamela Rogers Chepiga  
Allen & Overy LLP  
1221 Avenue of the Americas  
New York, NY 10020  
212-610-6300 (tel)  
212-610-6399 (fax)

***Counsel for Hicks***  
***02-CV-00299 (CKK)***

\_\_\_\_\_  
/s/

Mark Goldman  
Jenner & Block LLP  
601 Thirteenth Street, N.W.  
Suite 1200 South  
Washington, DC 20005-3823  
202-639-6000 (tel)  
202-639-6066 (fax)

