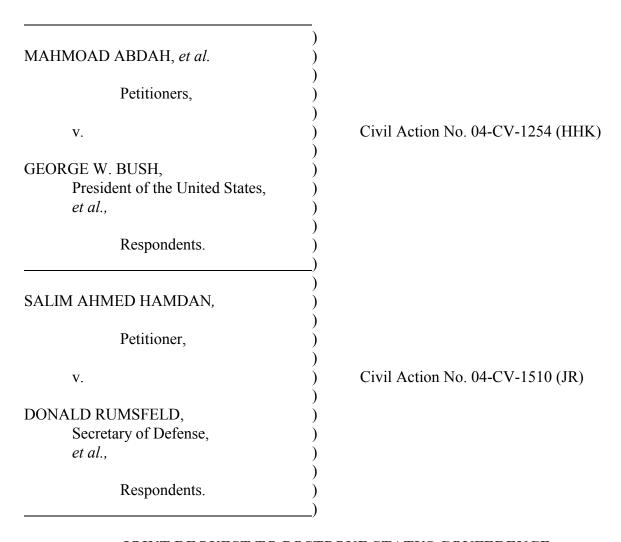
IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

DAVID M. HICKS,))
Petitioner,))
v.	Civil Action No. 02-CV-0299 (CKK)
GEORGE W. BUSH, President of the United States, et al.,)))
Respondents.)))
FAWZI KHALID ABDULLAH FAHAD AL ODAH, et al.)))
Plaintiffs,))
v.	Civil Action No. 02-CV-0828 (CKK)
UNITED STATES OF AMERICA, et al.,)))
Defendants.)))
MAMDOUH HABIB, et al.))
Petitioners,))
V.	Civil Action No. 02-CV-1130 (CKK)
GEORGE WALKER BUSH, President of the United States, et al.,)))
Respondents.)))

`	
MURAT KURNAZ, et al.	
Petitioners,	
v.)	Civil Action No. 04-CV-1135 (ESH)
GEORGE W. BUSH, President of the United States, et al.,	
Respondents.)	
O.K., et al. Petitioners,	
v.)	Civil Action No. 04-CV-1136 (JDB)
GEORGE W. BUSH, President of the United States, et al.,	
Respondents.)	
MOAZZAM BEGG, et al.	
Petitioners,	
v.)	Civil Action No. 04-CV-1137 (RMC)
GEORGE W. BUSH, President of the United States, et al.,	
Respondents.)	

RIDOUANE KHALID, et al.	
Petitioners,	
v.	Civil Action No. 04-CV-1142 (RJL)
GEORGE W. BUSH, President of the United States, et al.,)))
Respondents.)))
JAMIL EL-BANNA, et al.	
Petitioners,	
v.	Civil Action No. 04-CV-1144 (RWR)
GEORGE W. BUSH, President of the United States, et al.,)))
Respondents.)))
FALEN GHEREBI, et al.	
Petitioners,	
v.	Civil Action No. 04-CV-1164 (RBW)
GEORGE WALKER BUSH,))
et al.,))
Respondents.)))

LAKHDAR BOUMEDIENE, et al. Petitioners, Civil Action No. 04-CV-1166 (RJL) V. GEORGE WALKER BUSH, President of the United States, et al.. Respondents. SUHAIL ABDUL ANAM, et al. Petitioners, Civil Action No. 04-CV-1194 (HHK) V. GEORGE W. BUSH, President of the United States, et al., Respondents. ISA ALI ABDULLA ALMURBATI, et al. Petitioners, Civil Action No. 04-CV-1227 (RBW) V. GEORGE WALKER BUSH, President of the United States, et al., Respondents.



JOINT REQUEST TO POSTPONE STATUS CONFERENCE

Counsel for Respondents and Petitioners in the above-named cases respectfully request that the status conference in these cases currently scheduled for tomorrow, October 13, 2004, be postponed until Wednesday, October 20, 2004, and that a status report with respect to the Protective Order being negotiated by the parties be postponed until the day preceding the status conference.

Counsel for Respondents and Petitioners have made progress in narrowing their differences with respect to the Protective Order but have not yet completed their discussions.

Counsel also hope to narrow their other differences with respect to the proposed Counsel Access

Procedures and other issues, including number and frequency of visits by counsel for Petitioners

with their clients and issuance of security clearances to counsel for Petitioners. By narrowing

their differences in advance of the status conference, the parties hope to leave the Court with as

few issues for decision as possible.

In addition, a postponement of the status conference will permit government counsel to

be in a better position to report the progress being made with respect to establishing the secure

facility it has proposed for use by petitioner's counsel that is satisfactory to the Court and with

respect to the government's filing of factual returns with respect to individual petitioner-

detainees.

Undersigned counsel for the Abdah group of Petitioners (No. 1:04-cv-1254 (HHK)) has

discussed this joint request in conference calls with counsel for Petitioners in the other pending

cases. To the best of undersigned counsel's knowledge, no counsel for a Petitioner plans to

object to this joint request.

A proposed order is attached.

Dated: October 12, 2004

Respectfully submitted,

Attorneys for Respondents

PETER D. KEISLER

Assistant Attorney General

KENNETH L. WAINSTEIN

United States Attorney

BRIAN D. BOYLE

Principal Deputy Associate Attorney General

2

DAVID B. SALMONS Assistant to the Solicitor General

DOUGLAS N. LETTER Terrorism Litigation Counsel

ROBERT D. OKUN Chief, Special Proceedings Section

/s/ Terry M. Henry

JOSEPH H. HUNT (D.C. Bar No. 431134) VINCENT M. GARVEY (D.C. Bar No. 127191) TERRY M. HENRY JAMES J. SCHWARTZ (D.C. Bar No. 468625) Attorneys United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave., N.W. Room 6112 Washington, DC 20530

Tel: (202) 616-8267 Fax: (202) 616-8202

Attorneys for Petitioners

__/s/__David H. Remes_

Counsel for Mahmoad Abdah, et al Civil Action No.: 04-CV-1245 (HHK)

David H. Remes D.C. Bar No. 370782 Covington & Burling 1201 Pennsylvania Ave. NW Washington, DC 20004 Phone 202-662-5212 202-778-5212 (fax)