

DESCRIPTION OF MOTION FILED UNDER SEAL

This motion seeks the Court's permission to serve interrogatories, requests to produce documents, and notices of deposition on respondents regarding documents and information about respondents' torture, mistreatment, and abuse of detainees now at the Guantanamo Bay detention facility. Respondents have produced heavily redacted records of the Federal Bureau of Investigation describing such outrageous conduct by military interrogators at Guantanamo in a Freedom of Information Act lawsuit in New York. Nevertheless, respondents say they will oppose this motion. Petitioners seek to discover and share with the Court all such documents and information, in full and unredacted from, to support their habeas claims that they are being imprisoned without lawful authority and are suffering inhumane treatment. The motion also seeks an order compelling respondents to preserve and maintain the documents and information petitioners seek leave to discover.