

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
ISA ALI ABDULLA ALMURBATI, *ET AL.*,)
)
) **Petitioners,**)
)
) **v.**) **Civil Action No. 04-1227 (RBW)**
)
GEORGE WALKER BUSH, *ET AL.*,)
)
) **Respondents.**)
----- X

MOTION FOR TEMPORARY RESTRAINING ORDER

Petitioners, by counsel, hereby move this Court for entry of a temporary restraining order prohibiting Respondents from denying Petitioners' counsel in-person access to Petitioners if Petitioners are hospitalized at the U.S. Naval Base in Guantánamo Bay, Cuba.

In response to Petitioners' counsel's inquiry as to whether Respondents would consent to the relief request herein, Respondents' counsel declined to do so. Thus, Petitioners understand that Respondents oppose this motion.

Pursuant to LCvR 65.1(a), it is noted that all papers relevant to this application are filed electronically and, therefore, all counsel of record have notice of the application.

Dated: October 3, 2005

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/ Seth B. Waxman

Seth B. Waxman (D.C. Bar No. 456156)

Mark S. Sullivan*

Christopher Karagheuzoff*

Joshua Colangelo-Bryan*

Dorsey & Whitney LLP

250 Park Avenue

New York, NY 10177

(212) 415-9200

Counsel for Petitioners

CENTER FOR CONSTITUTIONAL RIGHTS
Barbara Olshansky
666 Broadway, 7th Floor
New York, NY 10012

Co-counsel for Petitioners

* Admitted pro hac vice