

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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SHERIF el-MASHAD, <i>et al.</i>,)	
	Petitioners,)	
)	
v.)	CASE NO. 1:05-CV-00270 (JR)
)	
GEORGE W. BUSH, <i>et al.</i>,)	
	Respondents.)	
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ALLADEEN, <i>et al.</i>,)	
	Petitioners,)	
)	
v.)	CASE NO. 1:05-CV-00833 (JR)
)	
GEORGE W. BUSH, <i>et al.</i>,)	
	Respondents.)	
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**JOINT MOTION FOR A TWO-WEEK CONTINUANCE FOR
A STATUS CONFERENCE**

Petitioners and Respondents (collectively, "Parties") jointly move for a two-week continuance of the status conference currently scheduled for January 13, 2006 for both *el-Mashad v. Bush* (CV-270) and *Alladeen v. Bush* (CV-833) and agree to the briefing schedule contained herein.

Counsel for Petitioners met with Petitioners for the first time on or about December 4, 2005. Counsel for Petitioners and counsel for Respondents had agreed that once Petitioners' counsel had returned from Guantanamo Bay, the Parties would submit briefs to the Court on any factual and legal issues raised by the visit and would agree to a briefing schedule once counsel's notes were available and reviewed

for classification. This plan has been delayed because counsel for Petitioners' notes from their visit were erroneously routed by the U.S. Postal Service. Pursuant to the terms of the Protective Order entered in these cases, counsel for Petitioners were required to leave their notes at Guantanamo Bay for transmission to the Court Security Officer in Washington, D.C for review and declassification. On January 5, 2006, the Court Security Officer informed counsel for Petitioner that the notes had been erroneously routed and the Officer had received the notes only that day. Counsel for Petitioners submitted these notes for classification review on January 6, 2006, but have not yet received an unclassified version of their notes.

This delay in receiving the notes delayed the planned submissions to the Court. In addition, without the benefit of unclassified notes, counsel for Petitioners are prejudiced in their ability to thoroughly brief this Court on the public record regarding the factual and legal issues raised by Petitioners during their visit to Guantanamo Bay. A two-week continuance would permit the Parties to submit briefs to the Court on issues raised by Petitioners, prior to a status conference, as originally planned.

Counsel for Petitioners will provide this Court with a brief on the factual and legal issues raised by their visit with Petitioners on January 17, 2006. Respondents will submit their reply to Petitioner's brief on January 24, 2006.

Undersigned counsel for Petitioners conferred with counsel for Respondents regarding the motion for a two-week continuance for a status conference. Respondents' counsel authorized undersigned counsel to submit this motion for two-week continuance for a status conference as a joint motion.

Dated: January 10, 2006

Respectfully submitted,

VENABLE LLP

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