

will be permitted as requested, unless the request is objected to. state with respect to each item or category that inspection and related activities document requests within 30 days after they are served. The response must 2. The responding party must provide a written response to these

after service of these Requests. dates as are mutually agreed upon between counsel but no later than 30 days Venable LLP, 575 7th Street, NW, Washington, DC 20004, on such date or 1. Production shall take place at the offices of Plaintiff's attorneys, at

INSTRUCTIONS

Bush, in his official capacity as President of the United States. following requests for the production of documents to Respondent George W. pursuant to Rule 34 of the Federal Rules of Civil Procedure, propounds the Petitioner Adel Fattouh Aly Ahmed Alazzar, by his attorneys and

**DOCUMENT REQUESTS TO RESPONDENT BUSH  
ON REPATRIATION ISSUES RELATING TO PETITIONER ALGAZZAR**

	)	
	)	<b>Respondents.</b>
	)	
	)	<b>GEORGE W. BUSH, et al.,</b>
	)	
	)	
<b>CASE NO. 1:05-CV-00270 (JR)</b>	)	<b>v.</b>
	)	
	)	<b>Petitioners,</b>
	)	
	)	<b>SHERIF el-MASHAD, et al.,</b>
	)	

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

of the author, addressee, custodian, and any other recipient to each other. any other recipient of the document, and where not apparent, the relationship document, including, where appropriate, the author, addressee, custodian, and document; and (e) such other information as is sufficient to identify the document; (c) the general subject matter of the document; (d) the date of the privilege is asserted: (a) the nature of the privilege being claimed, (b) the type of document, a log shall be provided containing, for each document as to which a 6. If there is a claim of privilege with respect to any requested

control said documents are to be found. categories of documents and identify the third person in whose possession or they are in the custody or control of a third person, identify such documents or 5. If documents called for herein are not available to you because the categories in these requests.

usual course of business, or shall be organized and labeled to correspond to party, or its attorneys. Documents shall be produced as they are kept in the investigators, agents, employees, or other representatives of the responding party's possession or control, or in the possession or control of its attorneys, 4. All documents are to be produced which are in the responding parts.

item or category, the part shall be specified and inspection of the remaining not stated in the response is deemed waived. If objection is made to part of an state, with specificity, the grounds for the objection. Any ground for objection 3. Where a request is objected to, the responding party must fully

4. As used herein, "Government of Egypt" refers to the Government of Egypt and any of its officials, agencies, agents, employees, representatives, and

employees, representatives, and attorneys.  
Government of the United States and any of its officials, agencies, agents,

3. As used herein, "United States Government" refers to the representatives.

Respondent in this action, and their agents, attorneys, employees, and  
2. As used herein, "Respondents" refers to each and every

Ahmed Alqazzar, and to his agents, attorneys, employees, and representatives.  
1. As used herein, "Alqazzar" refers to Petitioner Adel Fattouh Aly

DEFINITIONS

interpreted as an explicit or implicit restriction on any other request.  
9. No specific request for production of documents should be

other, or different information or documents are obtained before trial.  
the responding party to supplement its response and production if further,

extent permitted by Rule 26 of the Federal Rules of Civil Procedure, and require  
8. These document requests are continuing in character, to the full

substance of the document.  
directed the destruction, and identify those persons who have knowledge of the

identify the person or persons who destroyed the document and those who  
identify that document, state when and where the document was destroyed,

destroyed by the responding party or its agents, the response shall fully  
7. If any requested document is unavailable because it was lost or

attorneys. This term is not limited to the Egyptian national government, but also specifically includes any regional or local government entities within Egypt, and their officials, agencies, agents, employees, representatives, and attorneys.

5. As used herein, "Guantánamo Bay Facilities" refers to the detention facilities maintained by the United States Government at Guantánamo Bay, Cuba.

6. As used herein, the "Waxman Declaration" refers to the Declaration of Matthew C. Waxman dated October 14, 2005 and filed in the above-captioned case on October 17, 2005.

7. As used herein, "person" or "persons" means and includes natural persons, corporations, partnerships, sole proprietorships, unions, associations, federations, government agencies, or any other kind of entity.

8. As used herein, the term "document" or "documents" includes all "writings," "recordings" and "photographs" as defined in Rule 1001(1) and (2) of the Federal Rules of Evidence and all "writings, drawings, graphs, charts, photographs, phonorecords, and other data compilations from which information can be obtained," as defined in Rule 33(a) of the Federal Rules of Civil Procedure, and includes the "original" and all "duplicates," as defined in Fed. R. Evid. 1001(3) and (4), respectively, bearing notations or marks not found on the "original." The term "document" or "documents" further includes all drafts of any "original" or "duplicate."

9. As used herein, the term "communication" includes both oral and written communications.
10. As used herein, "statement" refers to any communication, written or oral, formal or informal.
11. As used herein with reference to a fact, occurrence, or contention, "referring" or "relating" includes containing, showing, relating to or referring to the fact, occurrence or contention, whether directly or indirectly. With respect to documents, these phrases are also meant to include documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by each interrogatory.
12. The singular includes the plural and vice versa; the words "and" and "or" shall be either conjunctive or disjunctive in such a manner as to specify the broader category of documents or other information; the word "all" means "any and all;" the word "any" means "any and all;" the word "including" means "including but not limited to;" the word "he" or any other masculine pronoun includes any individual regardless of gender. Any reference to a "person" includes a natural person, partnership, and unincorporated association, a professional association, or any other form of entity.
13. Whenever a range of dates is used herein, the dates providing either end of the range are included within the range.

of Alqazzar from the Guantanamo Bay Facilities.

to, or would apply to any transfer, potential transfer, or contemplated transfer requested by or provided to the United States Government that relate to, refer “assurances” (as that term is used in paragraph 4 of the Waxman Declaration)

5. All documents that address, discuss, contain, or describe any

discuss, refers or relates to Alqazzar.

between the United States Government and any other entity that address, “dialog” (as that term is used in paragraph 5 of the Waxman Declaration)

4. All documents that address, discuss, contain, or describe any

Alqazzar.

Egypt (or any agent, employee or representative) and that related or referred to Government (or any agent employee or representative) and the Government of

communication or correspondence between or among the United States 3. All documents that address, discuss, contain, or describe any

transfer of Alqazzar from the Guantanamo Bay Facilities.

that addresses or discusses the transfer, potential transfer, or contemplated Government (or any agent employee or representative) and any person or entity

communication or correspondence between or among the United States 2. All documents that address, discuss, contain, or describe any

Facilities.

transfer or contemplated transfer of Alqazzar from the Guantanamo Bay 1. All documents that address, discuss, any transfer, potential

6. All documents that address, discuss, contain, or describe any consideration of or any decision as to whether transfer of Alqazzar from the Guantanamo Bay Facilities to any destination would be consistent with the United States' obligations under any domestic or international law (including the Convention Against Torture, as referenced in paragraph 6 of the Waxman Declaration).
7. All documents that address, discuss, or describe any circumstance in which the United States declined to or decided not to transfer any individual to the custody of the Government of Egypt, where such a decision was based in whole or in part upon concerns related to possible torture or other mistreatment of the individual. This request specifically includes any of the "circumstances" referred to in paragraph 7 of the Waxman Declaration, to the extent that any such "circumstances" involved or related to the country of Egypt.
8. All documents that address, discuss, contain, or describe any consideration of any known instance or instances of torture, inhumane, or degrading treatment of a prisoner in the custody of the Government of Egypt.
9. All documents that refer or relate to the transfer of Ahmed Agiza and Mohammed al-Zari from Sweden to Egypt, to the treatment of either of those individuals in Egyptian custody, or to any assurances sought or provided relating to such individuals.
10. All documents that address, discuss, or set forth the reason, duration, or conditions of Alqazzar's detention.

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Respectfully submitted,

Dated: November 3, 2005