

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:	:	Misc. No. 08-442 (TFH)
	:	
	:	Civil Action No. 05-1509 (RMU)
GUANTANAMO BAY	:	Civil Action No. 05-1602 (RMU)
DETAINEE LITIGATION	:	Civil Action No. 05-1704 (RMU)
	:	Civil Action No. 05-2370 (RMU)
	:	Civil Action No. 05-2398 (RMU)
	:	Civil Action No. 08-1310 (RMU)

MOTION OF ABDUL SABOUR, ABDUL NASSER, HAMMAD MEMET, EDHAM MAMET, ARKIN MAHMUD, BAHTIYAR MAHNUT, AHMAD TOURSON, ABDUR RAZAKAH, ANWAR HASSAN, DAWUT ABDUREHIM, ABDUL GHAPPAR ABDUL RAHMAN AND ADEL NOORI FOR IMMEDIATE RELEASE ON PAROLE INTO THE CONTINENTAL UNITED STATES PENDING FINAL JUDGMENT ON THEIR *HABEAS* PETITIONS

Petitioners Abdul Sabour, Abdul Nasser, Hammad Memet, Edham Mamet, Arkin Mahmud, Bahtiyar Mahnut, Ahmad Tourson, Abdur Razakah, Anwar Hassan, Dawut Abdurehim, Abdul Ghappar Abdul Rahman and Adel Noori (collectively, the “Moving Uighur Petitioners”) respectfully move for their immediate release on parole into the continental United States pending final judgment on their *habeas* petitions.

On September 30, 2008, Respondents filed a notice of status as to the Moving Uighur Petitioners indicating that the government does not regard them as enemy combatants. Respondents previously conceded that they will afford the same treatment to Petitioners Huzaifa Parhat, Abdul Semet, Jalal Jalaldin, Khalid Ali and Sabir Osman. The Moving Uighur Petitioners therefore join in the motion previously filed by Petitioner Parhat – and subsequently joined by Petitioners Semet, Jalaldin, Ali and Osman – for immediate release on parole. As grounds therefore, the Moving Uighur Petitioners rely on the previously submitted Declarations of Alim Seytoff and Rebia Kadeer and adopt and incorporate by reference as if fully set forth

herein the arguments articulated in Petitioner Parhat's memorandum of points and authorities in support of his motion for immediate release on parole into the continental United States pending final judgment on his *habeas* petition and memorandum of points and authorities in support of his motion for judgment ordering his release. The Moving Uighur Petitioners also request that their motion be heard at the upcoming status hearing on October 7, 2008.

Dated: October 1, 2008

Respectfully submitted,

Susan Baker Manning
Catherine R. Murphy
BINGHAM McCUTCHEN LLP
1120 20th Street NW, Suite 800
Washington, DC 20036-3406
Telephone: (202) 778-6150
Facsimile: (202) 778-6155

/s/ Eric A. Tirschwell
Eric A. Tirschwell (Pursuant to LCvR 83.2(g))
Michael J. Sternhell (Pursuant to LCvR 83.2(g))
Darren LaVerne (Pursuant to LCvR 83.2(g))
Seema Saifee (Pursuant to LCvR 83.2(g))
KRAMER LEVIN NAFTALIS
& FRANKEL LLP
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000

Sabin Willett (Pursuant to LCvR 83.2(g))
Neil McGaraghan (Pursuant to LCvR 83.2(g))
Rheba Rutkowski (Pursuant to LCvR 83.2(g))
Jason S. Pinney (Pursuant to LCvR 83.2(g))
BINGHAM McCUTCHEN LLP
One Federal Street
Boston, Massachusetts 02110
Telephone: (617) 951-8000
Facsimile: (617) 951-8736

*Counsel to Petitioners Abdul Razakah, Ahmad
Tourson, Abdul Ghaffar and Adel Noori*

*Counsel for Petitioners Abdul Nasser, Abdul
Sabour, Abdul Semet, Hammad Memet,
Jalal Jalaldin, Khalid Ali, Sabir Osman and
Edham Mamet*

Elizabeth P. Gilson (Pursuant to LCvR 83.2(g))
383 Orange Street
New Haven, Connecticut 06511
Telephone: (203) 777-4050
Facsimile: (203) 787-3259

*Counsel for Petitioners Bahtiyar Mahnut and
Arkina Amahmud*

George Clarke
MILLER & CHEVALIER CHARTERED
655 15th Street, NW, Suite 900
Washington, DC 20005
Telephone: (202) 626-1573
Facsimile: (703) 598-5121

J. Wells Dixon (Pursuant to LCvR 83.2(g))
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, New York 10012
Telephone: (212) 614-6464
Facsimile: (212) 614-6499

*Counsel for Petitioners Ali Mohammad and
Thabid*

Counsel for All Uighur Petitioners