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RESPONDENTS AS "PROTECTED INFORMATION"**

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MAJID ABDULLA AL JOUDI, <i>et al.</i> ,)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 05-0301 (GK)
)	
GEORGE W. BUSH,)	
President of the United States, <i>et al.</i> ,)	
)	
Respondents.)	

STIPULATION AND ORDER

WHEREAS, respondents intend to release petitioner Majid Abdulla Al Joudi (ISN 025) from the custody of the United States and repatriate him to the Kingdom of Saudi Arabia, that is, transfer him to control of his home government for continued detention, investigation, and/or prosecution as that country deems appropriate, consistent with the policies and practices pertaining to such transfers as outlined in the declarations of Ambassador Pierre-Richard Prosper and Deputy Assistant Secretary of Defense for Detainee Affairs Matthew C. Waxman previously filed in this case. See Respondents' Memorandum In Opposition To Petitioners' Motion For Temporary Restraining Order and Preliminary Injunction (dkt. no. 14), Exhibit C (Prosper Declaration); Notice of Filing (dkt. no. 31), Exhibit A (Waxman Declaration).

WHEREAS, petitioner's counsel has consented to the transfer of petitioner Al Joudi from the custody of the United States to the control of the Kingdom of Saudi Arabia, as

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described above, in fewer than thirty days and has waived the requirement in the Court's April 4, 2005 Order (dkt. no. 19) that respondents provide petitioner's counsel with thirty days' advance notice prior to transporting or removing petitioner Al Joudi from the United States Naval Base at Guantanamo Bay, Cuba; and,

WHEREAS, respondents' position is that the fact of the impending transfer of petitioner should be accorded the status of "Protected Information" under the protective orders entered by the Court's Order of April 29, 2005 (dkt. no. 26) because public disclosure concerning a planned transfer or repatriation could complicate sensitive diplomatic dialogue necessary to carry out the transfer and present security concerns;

WHEREAS, the parties have agreed that, pursuant to the protective orders entered by the Court's Order of April 29, 2005, this Stipulation and Order shall be designated as "Protected Information" pending notice by respondents that the transfer of petitioner to Saudi Arabia has been completed;

IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, through undersigned counsel, that:


1. The requirement in the Court's April 4, 2005 Order (dkt. no. 19) that respondents provide thirty days' notice to the Court and petitioner's counsel prior to transferring petitioner Al Joudi from Guantanamo Bay is lifted such that respondents may carry out the transfer of petitioner, as described above, at the earliest practicable date; and
2. This Stipulation and Order shall be designated and handled as "Protected

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Information" pending notice by respondents that the transfer of petitioner to Saudi Arabia has been completed.


Dated: February 18, 2007

By: <u>Julia Tarver Mason (by AIW w/ permission)</u>	
Julia Tarver Mason	Andrew I. Warden
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Attorney for Petitioner

Attorney for Respondents

SO ORDERED this 18th day of February, 2007.


 UNITED STATES DISTRICT JUDGE

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