

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

FAWZI KHALID ABDULLAH FAHAD AL ODAH,)	
<i>et al.,</i>)	
Plaintiffs,)	
)	
v.)	No. CV 02-0828 (CKK)
)	
UNITED STATES OF AMERICA, <i>et al.,</i>)	
)	
Defendants.)	
)	

**JOINT MOTION TO APPLY THE “AMENDED PROTECTIVE ORDER AND
PROCEDURES FOR COUNSEL ACCESS TO DETAINEES” ENTERED BY JUDGE
GREEN ON NOVEMBER 8, 2004, TO ALL THE DETAINEES IN THE ABOVE-
CAPTIONED CASE AND FOR EXPEDITED CONSIDERATION**

On November 8, 2004, Judge Green entered an “Amended Protective Order and Procedures for Counsel Access to Detainees at the United States Naval Base in Guantanamo Bay, Cuba” (“Protective Order”). That Protective Order excepted from its terms three detainees—Mohammed Ahmed Al Kandari, Fawzi Khalid Abdullah Fahad al Odah, and Khalid Abdullah Mishal al Mutairi—whose access to counsel was the subject of this Court’s ruling of October 20, 2004, which imposed certain conditions that differ from the protective order. The government and petitioners hereby move to have the terms of the Protective Order apply to all the detainees in the above-captioned case, including the three detainees discussed in the October 20 ruling, except that with respect to ¶¶ 29 and 38 of the protective order, counsel for the al Odah petitioners may not share information pertaining to the three detainees discussed in the October 20 ruling with counsel for petitioners in the other coordinated cases, unless counsel receives prior express permission to do so from respondents’ counsel or from the Court. The parties agree that applying the Protective Order would eliminate numerous logistical problems for both the government and petitioners’ counsel arising from having different procedures apply only to

