

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
ISA ALI ABDULLA ALMURBATI, *ET AL.*,)
)
 Petitioners,)
)
 v.) Civil Action No. 04-1227 (RBW)
)
 GEORGE WALKER BUSH, *ET AL.*,)
)
 Respondents.)
----- X

MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

Petitioner Jumah Al Dossari (“Mr. Al Dossari”), by counsel, hereby moves this Court for entry of a temporary restraining order and preliminary injunction prohibiting Respondents from maintaining the conditions at the U.S. Naval Base in Guantánamo Bay, Cuba that have resulted in Mr. Al Dossari’s psychiatric distress and suicidality.

In response to Petitioner’s counsel’s inquiry as to whether Respondents would consent to the relief request herein, Respondents’ counsel declined to do so. Thus, Petitioner understands that Respondents oppose this motion.

Pursuant to LCvR 65.1(a), it is noted that all papers relevant to this application are filed electronically and, therefore, all counsel of record have notice of the application.

Dated: October 31, 2005

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/ Seth B. Waxman

Seth B. Waxman (D.C. Bar No. 456156)

Mark S. Sullivan*

Christopher Karagheuzoff*

Joshua Colangelo-Bryan*

Dorsey & Whitney LLP

250 Park Avenue

New York, NY 10177

(212) 415-9200

Counsel for Petitioners

CENTER FOR CONSTITUTIONAL RIGHTS

Barbara Olshansky

666 Broadway, 7th Floor

New York, NY 10012

Co-counsel for Petitioners

* Admitted pro hac vice