

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
SAIFULLAH PARACHA, <i>et al.</i> ,)	
)	
Petitioners,)	
)	
v.)	Civil Action No. 04-CV-2022 (PLF)
)	
GEORGE W. BUSH,)	
President of the United States,)	
<i>et al.</i> ,)	
)	
Respondents.)	
_____)	

**RESPONDENTS’ NOTICE OF SUBMISSION OF FACTUAL RETURN TO
PETITION FOR WRIT OF HABEAS CORPUS BY PETITIONER
SAIFULLAH PARACHA UNDER SEAL**

Respondents hereby provide notice that they have made available to petitioner’s counsel in the secure facility a copy of the factual return to the petition for writ of habeas corpus by petitioner Saifullah Paracha.¹ The version of the factual return made available to petitioner’s counsel contains the portion of the record publicly filed on January 18, 2005 via the Court’s CM/ECF system, and remaining portions of the record that are not suitable for public release, including portions that are classified and appropriate for disclosure to petitioner’s counsel under seal. Any redactions made in the factual return are explained in the declaration(s)/certification(s) submitted herewith.

¹ Although respondents submitted a version of the factual return to the Court under seal for *in camera* review on January 18, 2005, respondents did not make a copy available to counsel for petitioner at that time, pending the resolution of his challenge to, and pending his compliance with, the Protective Order entered in this case. See Respondents’ Factual Return to Petition for Writ of Habeas Corpus by Petitioner Saifullah Paracha and Notice of Submission Under Seal, filed January 18, 2005 (dkt. no. 21).

The factual return contains highlighting, explained therein, consistent with the Court's Order for Specific Disclosures Relating to Respondents' Motion to Designate as "Protected Information" Unclassified Information and Petitioners' Motion for Access to Unredacted Factual Returns, entered on December 8, 2004 by Judge Green in the coordinated cases. Respondents have designated certain highlighted, unclassified information in the factual return as "protected information" under the Protective Order. Pursuant to the Protective Order, once counsel for petitioner has reviewed the factual return and counsel for the parties have conferred, respondents will file a motion requesting that the Court designate the information in the factual return as "protected" pursuant to the Protective Order.²

Dated: August 2, 2005

Respectfully submitted,

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² Respondents are disclosing this information to petitioner's counsel, who has agreed to treat such information as "protected" unless and until the Court rules that the information should not be designated as "protected," consistent with Judge Green's Order Addressing Designation Procedures for "Protected Information" in In re Guantanamo Detainee Cases, No. 02-CV-0299, et al. (D.D.C. Nov. 10, 2004).

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