IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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MAJID KHAN,		:	
		:	
	Petitioner,	:	
		:	
v.		:	Civil Action No. 06-1690 (RBW)
		:	
BARACK OBAMA, et al.,		:	
		:	
	Respondents.	:	
	-	:	
		x	

NOTICE OF REQUEST FOR STAY

Petitioner Majid Khan, by and through his undersigned counsel, and pursuant to the Court's April 27, 2009 order (dkt. no. 198), respectfully submits this notice that he seeks to stay his habeas corpus petition until such time as counsel for the government can independently review the information regarding him that is compiled pursuant to Executive Order No. 13,492, and produce any exculpatory evidence discovered therein. The parties have met and conferred, and the government consents to the stay.

Khan also notifies the Court that there are two pending motions in this case. The first motion is Khan's request for disclosure of unredacted documents, filed on April 28, 2009, which is not fully briefed. The parties agree that motion should be stayed with the stay of Khan's habeas corpus petition. The second motion is Khan's request for expedited judgment, filed on April 6, 2009, which is fully briefed. The parties agree the Court is free to decide that motion at its discretion notwithstanding the stay of Khan's habeas corpus petition.

In addition, Khan notifies the Court that he will not be filing discovery motions or a

traverse until the stay of his habeas corpus petition is lifted or until further order of the Court.

Khan expressly reserves the right to file discovery motions and a traverse after the stay is lifted.

Date: New York, New York May 7, 2009

Respectfully submitted,

/s/ J. Wells Dixon J. Wells Dixon (Pursuant to LCvR 83.2(g)) Gitanjali S. Gutierrez (Pursuant to LCvR 83.2(g)) Shayana D. Kadidal CENTER FOR CONSTITUTIONAL RIGHTS 666 Broadway, 7th Floor New York, New York 10012 Tel. (212) 614-6423 Fax (212) 614-6429 wdixon@ccrjustice.org ggutierrez@ccrjustice.org skadidal@ccrjustice.org

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