UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

MAHER ARAR,

Plaintiff,

- against -

JOHN ASHCROFT, formerly Attorney General of the United States; LARRY D. THOMPSON, formerly Acting Deputy Attorney General; TOM RIDGE, formerly Secretary of State for Homeland Security; JAMES W. ZIGLAR, formerly Commissioner for Immigration and Naturalization Services; J. SCOTT BLACKMAN, formerly Regional Director of the Eastern Regional Office of the Immigration and Naturalization Services; PAULA CORRIGAN, Regional Director of Immigration and Customs Enforcement; EDWARD J. McELROY, formerly District Director of Immigration and Naturalization Services for New York District and now District Director of Immigration and Customs Enforcement; ROBERT MUELLER, Director of the Federal Bureau of Investigation; and JOHN DOES 1-10, Federal Bureau of Investigation and/or Immigration and Naturalization Service Agents,

Defendants.

04-CV-0249-DGT-VVP

NOTICE OF MOTION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 54(b)

PLEASE TAKE NOTICE that Plaintiff Maher Arar, by his undersigned attorneys, moves this Court for an order pursuant to Federal Rule of Civil Procedure 54(b) directing the entry of final judgment with respect to this Court's dismissal with prejudice of Counts I, II, and III of the complaint in this case.

Oral argument on this motion will be on a date and at a time designated by the Court.

Pursuant to Local Civil Rule 7.1, Plaintiff respectfully submits herewith a memorandum of law in support of this motion.

Dated: New York, New York April 3, 2006

Respectfully submitted,

Robert F. Fink (RF 2848)

Joshua S. Sohn (JS 4110)

MaryAnn Rekuc (MR 7465)

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