



will not comply with the Release Order voluntarily, civil contempt is an appropriate remedy. Moreover, because the Government of Kuwait has repeatedly requested that the United States promptly return Al Rabiah, no further diplomatic steps are necessary; this Court can and should order Respondents to return Al Rabiah to Kuwait by a date certain. *See Ahmed v. Obama*, Civil Action No. 05-1678 (GK), Order filed October 1, 2009 [dkt 249].

**Certificate Required by LCvR 7(m)**

Pursuant to LCvR 7(m), counsel for Petitioner contacted counsel for Respondents in a good faith effort to obtain Respondents' consent to the requested relief. Counsel for the parties exchanged e-mails and spoke by telephone on October 5, 2009, in an unsuccessful attempt to resolve this issue. The details of counsel's discussions are set forth in the accompanying Declaration of David J. Cynamon. Counsel for Respondents stated that the government opposes this motion.

Dated: October 13, 2009

Respectfully submitted,

/s/

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