

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IN RE:

**GUANTANAMO BAY
DETAINEE LITIGATION**

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)
)
) **Misc. No. 08-442 (TFH)**
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)

SALIM SAID, *et al.*,

Petitioners,

v.

)
) **Civil Action No. 05-CV-2384 (RWR)**
)
)
)

GEORGE W. BUSH, *et al.*,

Respondents.

DECLARATION OF PATRICIA A. BRONTE

The undersigned, Patricia A. Bronte, attorney at law, declares and states as follows:

1. I am one of the attorneys who has represented Mohammed Zahrani in this matter.

I submit this declaration in support of the Unopposed Motion to Stay Petition for Writ of Habeas Corpus of Petitioner Mohammed Zahrani.

2. I have not yet been able to meet with Mr. Zahrani for the following reasons:

a. I was scheduled to meet with Mr. Zahrani on June 10, 2006. On that morning, members of the Staff Judge Advocate's office informed me that no habeas counsel would be permitted to meet with their clients that day. Later in the day, I learned that three prisoners had died and, as a result, the prison camp was closed.

b. My partner, David J. Bradford, attempted again to meet with Mr. Zahrani on the morning of August 2, 2006. The military escort informed him that Mr. Zahrani refused

this meeting. Neither Mr. Bradford nor his translator was permitted to see Mr. Zahrani to confirm his wishes regarding the meeting.

c. On May 12, 2008, the Department of Defense produced to me a number of unclassified documents pursuant to litigation under the Freedom of Information Act, including a log of interactions between Mr. Zahrani and his guards on August 1 and 2, 2006. The log contains detailed entries for August 1 and 2, 2006, but none of the entries indicates that Mr. Zahrani refused to meet with counsel or that Mr. Zahrani was informed that counsel had traveled to Guantánamo to meet with him.

d. On October 1, 2008, I attempted again to meet with Mr. Zahrani. The military escort informed me that Mr. Zahrani refused this meeting. I then wrote a message to Mr. Zahrani on a form provided by the escort. My translator translated the message into Arabic. At the bottom of the form is the question “Do you wish to meet with your habeas attorney?” followed by “yes” and “no” boxes and a space for the client’s signature.

e. At 9:30 a.m., the escort gave the English and Arabic forms to three attorneys from the Staff Judge Advocate’s Office (the “SJAs”). The SJAs agreed to deliver the Arabic form to Mr. Zahrani in his cell at Camp 6. At 9:40 a.m., the SJAs informed me that Mr. Zahrani told them, through a military interpreter, “I don’t have an attorney and I don’t want to read your paper.” Mr. Zahrani did not sign the form, nor did he check either the “yes” or “no” box beside the question “Do you wish to meet with your habeas attorney?”

f. Neither I nor my translator was permitted to see Mr. Zahrani to confirm his wishes regarding the meeting.

3. The SJAs informed me that Mr. Zahrani is being held in Camp 6. I am informed and believe that all prisoners in Camp 6 are held in solitary confinement in steel and concrete

cells, where the prisoners remain isolated from fresh air, sunlight, and any contact with fellow prisoners or other persons except guards and interrogators.

4. I have written several letters to Mr. Zahrani since April 2006. Some but not all of those letters have been returned to me. I do not know why the letters were returned to me, nor can I confirm that Mr. Zahrani received or refused them. Except as noted herein, I have not received any communications from Mr. Zahrani.

5. To my knowledge, Mr. Zahrani has not met with a civilian attorney during his six-year confinement at Guantánamo. I do not have any information regarding Mr. Zahrani's physical or mental condition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2008.

Signed,

A handwritten signature in cursive script, reading "Patricia A. Burt". The signature is written in black ink and is positioned below the word "Signed,".