

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	X	
	:	
IN RE:	:	
	:	
GUANTÁNAMO BAY	:	Misc. No. 08-442 (TFH)
DETAINEE LITIGATION	:	
	:	
_____	X	
	:	
IN RE:	:	
	:	
PETITIONERS SEEKING HABEAS	:	Misc. No. 08-444 (TFH)
CORPUS RELIEF IN RELATION TO PRIOR	:	
DETENTIONS AT GUANTÁNAMO BAY	:	
	:	
_____	X	
	:	
MOHAMMED SULAYMON BARRE,	:	
	:	
Petitioner,	:	
	:	
v.	:	Civil Action No. 08-1153 (HHK)
	:	
BARACK H. OBAMA, ROBERT M. GATES,	:	
DAVID M. THOMAS, JR., BRUCE VARGO,	:	
	:	
Respondents.	:	
	:	
_____	X	

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioner Mohammed Sulaymon Barre, by and through his undersigned counsel, hereby moves for permission to appeal against all respondents to the United States Court of Appeals for the District of Columbia Circuit from the minute order of April 19, 2010, and the judgment of April 30, 2010 (Docket No. 174 in Civil Action No. 08-1153), dismissing his petition for a writ of habeas corpus, without being required to pay or to give security for costs and fees associated with the appeal.

Mr. Barre was abducted from his home in Karachi, Pakistan in November 2001, and was eventually transferred to Guantánamo Bay, where he was imprisoned without charge or trial until December 2009, when he was repatriated to the Republic of Somaliland. During the period of his imprisonment at Guantánamo Bay, Mr. Barre was unable to work and had no access to any assets or means of income. As set forth in the declaration of his undersigned counsel, attached hereto as Exhibit A, Mr. Barre does not have the assets or income to pay or to give security for costs and fees associated with his appeal.

This motion should be granted accordingly.

Dated: New York, New York
June 15, 2010

Respectfully submitted,

/s/ J. Wells Dixon

Shayana D. Kadidal (D.C. Bar No. 454248)
J. Wells Dixon (Pursuant to LCvR 83.2(g))
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wdixon@ccrjustice.org

Counsel for Mohammed Sulaymon Barre

EXHIBIT A

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MOHAMMED SULAYMON BARRE,	:	
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DAVID M. THOMAS, JR., BRUCE VARGO,	:	
	:	
Respondents.	:	
	:	

DECLARATION OF J. WELLS DIXON

I, J. WELLS DIXON, pursuant to 28 U.S.C. § 1746, declare as follows:

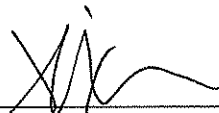
1. I am an attorney at the Center for Constitutional Rights, 666 Broadway, 7th Floor, New York, New York 10012 ("CCR"). CCR is counsel to petitioner Mohammed Sulaymon Barre in the above-referenced actions.

2. CCR has represented Mr. Barre in connection with legal challenges to his detention at Guantánamo Bay since 2007. CCR's representation of Mr. Barre has always been conducted on a *pro bono* basis.

3. Mr. Barre was released from Guantánamo Bay in December 2009, and repatriated to the Republic of Somaliland. I have since communicated with Mr. Barre via telephone and email, and he has informed me that he does not have the assets or income to pay for costs and fees associated with his appeal from this Court's dismissal of his habeas corpus petition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: New York, New York
June 15, 2010



J. Wells Dixon