

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

IN RE: GUANTANAMO BAY DETAINEE LITIGATION	: Misc. No. 08-442 (TFH) : : Civil Action No. 05-1509 (RMU) : Civil Action No. 05-1602 (RMU) : Civil Action No. 05-1704 (RMU) : Civil Action No. 05-2370 (RMU) : Civil Action No. 05-2386 (RMU) : Civil Action No. 05-2398 (RMU)
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DECLARATION OF JASON S. PINNEY

I, Jason S. Pinney, hereby declare under penalty of perjury that the following facts are true and accurate to the best of my knowledge and belief:

1. I am an attorney with Bingham McCutchen LLP.
2. My principal work address is One Federal Street, Boston, MA 02110.

DIRECT ORAL REPRESENTATION AUTHORIZATIONS

Petitioner Hammad Mehmet

3. Hammad Mehmet (ISN 328) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.
4. On July 29, 2005, Bingham McCutchen filed a habeas corpus petition on Petitioner Mehmet's behalf based on the next friend authorization provided by Jamal Kiyemba, dated March 10, 2005. A copy of that authorization is attached as Exhibit A¹.
5. On December 4, 2006, Bingham McCutchen filed a petition under the Detainee Treatment Act of 2005 on Petitioner Mehmet's behalf.

¹ Bingham McChutchen has also obtained authorization to represent Petitioner Mehmet from his brother.

6. In January of 2007, during a meeting with Petitioner Mehmet, I prepared a declaration, which was witnessed by Ms. Rushan Abbas, a Uyghur translator who accompanied me during the meeting. A copy of the declaration is attached as Exhibit B.

7. As set forth in the declaration, Petitioner Mehmet orally authorized Bingham McCutchen to represent him as counsel in all actions in order to secure his release from Guantánamo Bay. Petitioner Mehmet indicated that he was not willing to sign a declaration himself because he does not have faith in the legal system, and because he is wary of signing documents.

Petitioner Jalal Jalaldin

8. Jalal Jalaldin (ISN 285) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

9. On July 29, 2005, Bingham McCutchen filed a habeas corpus petition on Petitioner Jalaldin's behalf based on the next friend authorization provided by Jamal Kiyemba, dated March 10, 2005².

10. On December 4, 2006, Bingham McCutchen filed a petition under the Detainee Treatment Act of 2005 on Petitioner Jalaldin's behalf.

11. In January of 2007, during a meeting with Petitioner Jalaldin, I prepared a declaration, which was witnessed by Ms. Rushan Abbas, a Uyghur translator who accompanied me during the meeting. A copy of the declaration is attached as Exhibit C.

12. As set forth in the declaration, Petitioner Jalaldin orally authorized Bingham McCutchen to represent him as counsel in all actions in order to secure his release from Guantánamo Bay.

² Bingham McCutchen has also obtained authorization to represent Petitioner Jalaldin from his sister and brother-in-law.

Petitioner Jalaldin indicated that he was not willing to sign a declaration himself because he does not have faith in the legal system, and because he is wary of signing documents.

Petitioner Abdul Nassir

13. Abdul Nassir (ISN 278) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

14. On July 29, 2005, Bingham McCutchen filed a habeas corpus petition on Petitioner Nassir's behalf based on the next friend authorization provided by Jamal Kiyemba, dated March 10, 2005.

15. On March 13, 2007, Bingham McCutchen filed a petition under the Detainee Treatment Act of 2005 on Petitioner Nassir's behalf.

16. In January of 2007, during a meeting with Petitioner Nassir, my colleague Sabin Willett prepared a declaration, which was witnessed by Ms. Rushan Abbas, a Uyghur translator who accompanied Mr. Willett during the meeting. A copy of the declaration is attached as Exhibit D.

17. As set forth in the declaration, Petitioner Nassir orally authorized Bingham McCutchen to represent him as counsel in all actions in order to secure his release from Guantánamo Bay. Petitioner Nassir indicated to Mr. Willett that he was not willing to sign a declaration himself.

Petitioner Khalid Ali

18. Khalid Ali (ISN 280) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

19. On July 29, 2005, Bingham McCutchen filed a habeas corpus petition on Petitioner Ali's behalf based on the next friend authorization provided by Jamal Kiyemba, dated March 10, 2005.

20. On December 4, 2006, Bingham McCutchen filed a petition under the Detainee Treatment Act of 2005 on Petitioner Ali's behalf.

21. In January of 2007, during a visit with Petitioner Ali, my colleague Sabin Willett prepared a declaration, which was witnessed by Ms. Rushan Abbas, a Uyghur translator who accompanied Mr. Willett on the visit. A copy of the declaration is attached as Exhibit E.

22. As set forth in the declaration, Petitioner Ali orally authorized Bingham McCutchen to represent him as counsel in all actions in order to secure his release from Guantánamo Bay. Petitioner Ali indicated to Mr. Willett that he was not willing to sign a declaration himself because he cannot trust American documents.

DIRECT WRITTEN REPRESENTATION AUTHORIZATIONS

Petitioner Huzaifa Parhat

23. Huzaifa Parhat (ISN 320) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

24. Attached as Exhibit F is a true and correct copy of a letter signed by Huzaifa Parhat directly authorizing Bingham McCutchen to represent him.

Petitioner Sabir Osman

25. Sabir Osman (ISN 282) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

26. Attached as Exhibit G is a true and correct copy of a letter signed by Sabir Osman directly authorizing Bingham McCutchen to represent him.

Petitioner Abdul Semet

27. Abdul Semet (ISN 295) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

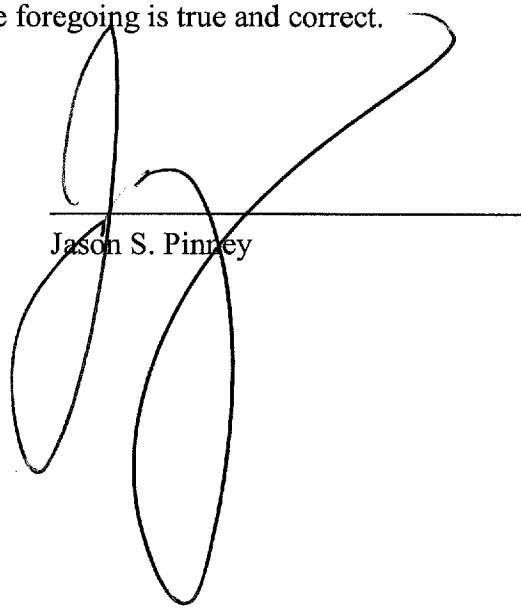
28. Attached as Exhibit H is a true and correct copy of a translated letter from Petitioner Semet directly authorizing Bingham McCutchen to represent him. Portions of the letter have

been redacted based on privilege concerns. There is nothing in the redacted sections suggesting that Petitioner Semet does not want Bingham McCutchen to represent him.

Verification

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

Executed on September 14, 2008.



Jason S. Pinney

EXHIBIT A

AUTHORIZATION & NOTIFICATION

I, JAMAL KILMEBA (#701), UNDERSTAND THE LEGAL TERM "NEXT FRIEND" AND FIRMLY BELIEVE THAT THE FOLLOWING PEOPLE (AS ATTACHED) WHO I HAVE COME TO KNOW DURING MY CAPTIVITY SINCE MARCH 2002, WANT ME TO ACT AS THEIR "NEXT FRIENDS", AND AUTHORIZE CLIVE STAFFORD SMITH TO SEEK ANY LEGAL REDRESS ON THEIR BEHALF THAT IS POSSIBLE, AND I SO AUTHORIZE HIM; I ALSO SUBMIT THIS DOCUMENT AS EVIDENCE, INDEPENDENT OF THEIR RELIANCE UPON ME AS "NEXT FRIENDS" OF THEIR SPECIFIC DESIRE FOR A LAWYER AND FOR A LEGAL CHALLENGE TO THE ILLEGALITY OF THEIR DETENTION BY THE UNITED STATES OF AMERICA.

THIS AUTHORIZATION & NOTIFICATION APPLIES TO ALL PERSONS LISTED ON THE ATTACHED LISTS, AS INITIALED BY ME.

MARCH 10th, 2005.

Kilmeba

FOUO

1	ALI	UZBEKISTAN	CAMP I	
2	ABDULLAH	UZBEKISTAN	CAMP I	
3	KHAMD	TURKISTAN	CAMP 4	(UIGUR)
4	ABUSAMUR	"	"	"
5	ABUSAMAD	"	"	"
6	HAMMAD	"	"	"
7	ABUNASIR	"	"	"
8	JALAL	"	"	"
9	BILAL	SYRIAN	CAMP I	(ARABIC)
10	FAISAL	SAUDI	CAMP I	"
11	BANDAR ALJABIR	"	"	"
12	AHMAD	TURKISTAN	CAMP 4	(UIGUR)
13	SADIQ	"	"	"
14	WALID	SUDAN	CAMP I	
15	HAMMAD	"	CAMP 4	
16	MAHMOOD	SUDAN	CAMP I	
17	SALIMULLAH	TUNISIAN	CAMP II	ITALIAN? ARABIC
18	MUSUF ASHILAH	SAUDI	CAMP III	
19	MUSUF ARIBEH	SAUDI	CAMP I	
20	ABDULLAH	TUNISIAN	CAMP II	ITALIAN?
21	ADIL IBRAHIM	TUNISIAN	CAMP IV	ITALIAN?
22	ABU RAWDAH	SYRIAN	CAMP I	
23	SABIR	TURKISTAN	CAMP IV	(UIGUR)
24	SALIH	TURKISH	CAMP IV	
25	DE ABU MUHAMMAD	ALGERIAN	CAMP IV	(ENGLISH) (ARABIC)
26	EVONS ILL SALMAN ALBAHRI	SAUDI	CAMP I	
27	JAABIR ALQAM		CAMP II	

UNCLASSIFIED

J.K.

Krijan

RIDWAN ALMAGREBI
LEAH ALHAKAZI
LEAH ALHAKAZI
HUSHAIFA
2 ARDURAIMAN (441)
3 SAEIQ
NABIL

MOROCCAN
SAUDI
YEMENI
TURKISH
YEMENI
ALGERIAN
ALGERIAN

CAMP II Arabic
CAMP I Uygur
CAMP I Arabic
CAMP I Arabic
CAMP I French Arabic

Kiyurd

FOUO

EXHIBIT B

13/

at CTND. He authorized me and my

3. I will w/ Howard on 11/10/07

6 Howard 15N 328

- taken copy photos and a DTA path

2. My firm appears in GLD

Byham M. Clarke in Boston, MA.

1. I am an attorney with

the following in files:

the press and penalties of paying that

1. attorney John S. Kinney, Sweet's order

King's [DOC] 06-1509
Bush

P. 14-1 [CAD (GLD 11/10/07)]
Cats

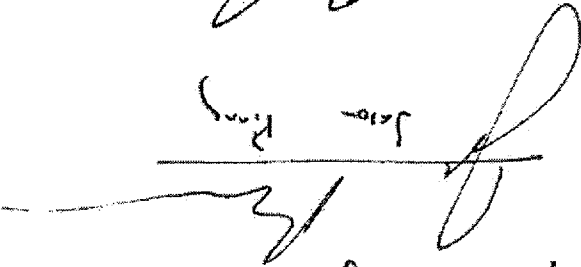
14/

Witness:

Rick Allen



John King



Signatures 15th day of January 2007.

Ball

prints all legal matters on file

EXHIBIT C

17/18

① I met with S.I. Sella on 1/22/18 at CTMO. He advised me

S.I. Sella, ISN 285. Corp. Raha and DTA Raha for

② M. Kim L. Liu = Raha. M. Clark LLP = Raha, MA.

③ I am working with Bingham

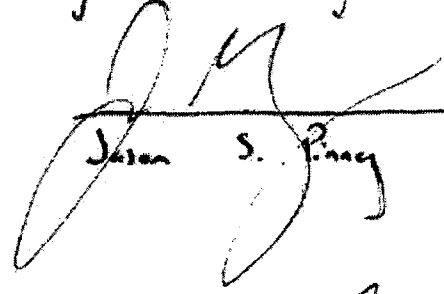
following "press" part and position of party. The following items were seen under the

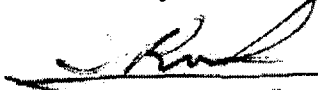
Right
Kiyat
] DDC Raha Corp R+ 06-1509 Raha

Left
Guth
] DTA R+ Liu 11/06 CADC

and, to pursue all legal matters
on his behalf.

Signed this 22nd Day of January, 2009.


Jason S. Pinsky

Witness: 
Rishan Abbas

4. Jalel Jaleldin also, like Hamoud
Mehant (ISN 328), acknowledges the legitimacy
of the Next Friend Petition filed by
his family members. In Jalel's case, it
is his sister and brother in law.

18/18

1/22/09




Jason S. Pinsky


EXHIBIT D

1.17.07

I declare under penalty of perjury that
Abdulhaseem (No 278) at approximately 3 pm
today, instructed me and Bingham McCutchen
to take all steps and file and pursue all litigation
remedies to obtain his release from

Guantanamo Bay, including adding him to the
DTA petition in Parhat v. Rumsfeld. He declines to
sign any documents.

I declare that the foregoing is true.

Sgt Willett

1.17.07

witness:



Rushan Abbas

EXHIBIT E

1/16/07AUTHORIZATION

Khulil authorizes psw + Bingham to

vigorously pursue the DTA petition and
any related litigation to secure his

Release. 3 pm - Camp Iguana -

Declines to sign - CANNOT TRUST AMERICAN DOCUMENTS,
EVEN IF TRANSLATED.

I declare under penalty of perjury the
above is true

16 JAN 2007

Sul Willett
SABIN WILLETT

Witness:


Ruslan Abbas

Interpreter

EXHIBIT F

Nov. 07th 2005

To Sabin Willett,
BINGHAM McCUTCHEN LLP.

From: HUDHAFI ISN 320
CAMP DELTA
Guantanamo Bay. CUBA

I hope this finds you well and in good health.

I am Hudhafa from Turkistan, I received your letter on Nov. 05th, 05
and I thank you for trying to represent me in front of a civilian
court in the United States.

This letter is a request to you to represent me in front of a
civilian court in the United States with a petition for writ
of habeas corpus, and I request also you coming to meet
me here at the U.S Naval Base - Guantanamo Bay. CUBA.
and I will be very thankful.

Note: I speak UGHUR Language only.

Gratefully
Hudhafa
تۆزۈپ بەردىدات

FOUO

EXHIBIT G

Nov. 07th 2005

To Sabir Willett
Bingham McCutchen LLP.

From: Sabir ISN: 282
Camp Delta
Guantanamo Bay, Cuba

I hope this finds you well and in good health.

I am Sabir from Turkistan, I received your letter on Nov. 05 - 2005, and I thank you for trying to represent me in front of the United States civilian court.

This letter is a request to you to represent me in front of a civilian court in United States with a petition for writ of habeas corpus, and I request also your coming to meet me here at the U.S. Naval Base - Guantanamo Bay - Cuba, and I will be very thankful.

Note: I speak UIGHUR Language only.

FOUO UNCLASSIFIED

Gratefully
Sabir
...

EXHIBIT H

FOR OFFICIAL USE ONLY

February 1, 2006

Dear Mr. Sabin Willet,

How are you? I received three letters from you and thank you very much for offering to represent me. For that, I am grateful to you and your colleagues.

REDACTED

FOR OFFICIAL USE ONLY

FOR OFFICIAL USE ONLY

REDACTED

I know
how to pay back people's kindness and I would sincere appreciate anyone who can get
me out of this ordeal.

Lastly, I respectfully ask you and your colleagues to educate me on the legal basis and
the procedures that the US military tribunal followed in determining my statutes as an
enemy combatant. I really hope this letter will find you and I am eagerly looking forward
to hearing back from you.

Sincerely yours,

Abdusemet (ISN #295)

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