

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

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

DECLARATION OF NEIL MCGARAGHAN

1. I am an attorney with Bingham McCutchen LLP.
2. My business address is One Federal Street, Boston, MA 02110.
3. Edham Mamet (ISN 102) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.
4. On August 11, 2005, Bingham McCutchen filed a habeas corpus petition on Petitioner Mamet's behalf based on the next friend authorization provided by Mr. Mamet's brother, Ibrahim Mamet, dated August 2, 2005. An English and a counter-signed Uighur version of that authorization are attached as Exhibit A.
5. On April 26, 2007, Bingham McCutchen filed a petition under the Detainee Treatment Act of 2005 on Petitioner Mamet's behalf.
6. On September 26, 2008, I spoke to Mr. Mamet by telephone from my office in Boston. Ms. Rushan Abbas was also on the line and served as our interpreter.
7. During our telephone call on September 26, 2008, Mr. Mamet authorized Bingham McCutchen to represent him as counsel to secure his release from Guantánamo Bay, and requested that we continue our litigation efforts on his behalf.

8. Mr. Mamet has not agreed to meet us previously, and has not written to us. During our phone conversation on September 26, 2008, Mr. Mamet indicated that he will not meet with his counsel in person, nor correspond with counsel via mail. Accordingly, we are unable to obtain a written authorization from Mr. Mamet.

9. Abdul Sabour (ISN 275) is a Uyghur prisoner held at the U.S. Naval Station at Guantánamo Bay, Cuba.

10. On July 29, 2005, Bingham McCutchen filed a habeas corpus petition on Petitioner Sabour's behalf based on the next friend authorization provided by Jamal Kiyemba, dated March 10, 2005. *See* Exhibit A to Declaration of Jason S. Pinney filed in support of the Authorization Report.

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

12. On September 26, 2008, I spoke to Mr. Sabour by telephone from my office in Boston. Ms. Rushan Abbas was also on the line and served as our interpreter.

13. During our telephone call on September 26, 2008, Petitioner Sabour authorized Bingham McCutchen to represent him as counsel to secure his release from Guantánamo Bay, and requested that we continue our litigation efforts on his behalf.

14. Petitioner Sabour has not agreed to meet us previously, and has not written to us. During our phone conversation on September 26, 2008, Petitioner Sabour indicated that he will not meet with his counsel in person, nor correspond with counsel via mail. Accordingly, we are unable to obtain a written authorization from Petitioner Sabour.

Signed under pain and penalty of perjury this 29th day of September, 2008.



Neil McGaraghan

EXHIBIT A

Susan Baker Manning
Direct Phone: (202) 778-6172
Direct Fax: (202) 778-6155
susan.manning@bingham.com
Our File No.: 0999997-0000928706

July 25, 2005

VIA FACSIMILE

Mr. Ibrahim Mamet
Istanbul, Turkey

**Re: Acknowledgement of Representation
Edham Mamet, Detainee – Guantánamo Bay Naval Station
Ibrahim Mamet, Next Friend of Edham Mamet**

Dear Mr. Mamet:

I write to confirm that you have asked Sabin Willet and I to represent your brother, Edham Mamet, in connection with his incarceration by the United States Government at the Guantánamo Bay Naval Station, and that our law firm, Bingham McCutchen LLP, is authorized to take all appropriate action related to the representation, including but not limited to filing a *habeas corpus* petition seeking Edham's release. On behalf of Bingham McCutchen, Sabin and I have agreed to the representation.

Please acknowledge this agreed representation by signing and dating where indicated below. Please return the signed letter to me via facsimile to (202) 778-6155.

Sincerely yours,

Susan Baker Manning

ACKNOWLEDGED AND AGREED.

Dated: _____, 2005

Ibrahim Mamet

Bingham McCutchen LLP
Suite 800
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20036-3406

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BINGHAM McCUTCHEN

سۇزان بېكەر مانىڭ

بىۋاسىتە تېلېفونى : 202-778-6172

بىۋاسىتە فاكسى : 202-778-6155

ئىمېيل ئادرېسى susan.manning@bingham.com

دېلو نومۇرى : 0999997-0000928706

2005-يىلى 27-كۈنى

ھۆرمەتلىك ئىبراھىم مەھمەت،

ئىستانبۇل- تۈركىيە

گۇۋاھنامىنىڭ دەپكەز ھەرىتىسىدە تۇتۇپ تۇرۇلغان تەدبىر مەھمەتنىڭ
ۋاكالىتچىلىكىنى تىنچراپ قىلىش مەسلىھىتى

ھۆرمەتلىك مەھمەت تەپەندىم،

مەن بۇ خەتنى سىزگە ، سىزنىڭ سايبىن ۋىلى (Sabin Willet) نامىدىن ، نامىرىكا ھۆكۈمىتى
تەرىپىدىن گۇۋاھنامىنىڭ دەپكەز ھەرىتىسىدە تۇتۇپ تۇرۇلغان ئىشنىڭ تەدبىر مەھمەتكە
ۋاكالىتچى بولۇشىمىز توغرىسىدىكى تەلپىڭىزنى تەسدىقلاش ھەمدە بىزنىڭ ھوقۇق
شەرتىمىز ، Bingham McCutchen LLP نىڭ ئىشلىرىغا ۋاكالىتچى ئۈچۈن پۈتۈن

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Boston

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London

Los Angeles

New York

Orange County

San Francisco

Silicon Valley

Tokyo

Walnut Creek

Washington

مۇناسىۋەتلىك ئىشلارنى بىجىرىشتە شۇنداقلا ئىشقا ئىزدەشنىڭ قىيىنچىلىقى ئۈچۈن
 سوققا تەرز سۈنۈشقا قانۇنى جەھەتتىن تولۇق ھوقۇققا ئىگە ئىكەنلىكىنى خەۋەر قىلىش
 ئۈچۈن يېزىۋاتىمەن .

ھەمدە Bingham McCutchen ھوقۇقچىلىرى شىركىتى بىلەن سابىن (Sabine) ئىشقا
 سوت ئىشلىرىدا ۋاكالىتى بولۇشنى قوبۇل قىلىغانلىقىنى بىلدۈرمىسىز .

Bingham McCutchen LLP
 bingham.com

مەھرەمەت قىلىپ، تۆۋەندە كۆرسىتىلگەن بەرگە قول قويۇش ئارقىلىق، بىزنىڭ
 ۋاكالىتىڭىزنى قوبۇل قىلغانلىقىڭىزنى ئىتىراپ قىلىپ، بۇ خەتنىڭ فاكس ئارقىلىق
 بىزگە ئەۋەتىپ بېرىلگەنلىكىنى ئۈمىد قىلىمەن . فاكس نومۇرى 202-788-6155

ھۆرمەت بىلەن

سۇزان بەكەر مانتىڭ

Susan Baker Manning

قوبۇل ۋە تەسدىق قىلىندى

2005.08.02 تارىخ

ئىبراھىم مەھمەت

قىسقا مەزگىل