

EXHIBIT A

Warden, Andrew (CIV)

From: Willett, P. Sabin [sabin.willett@bingham.com]
Sent: Monday, October 20, 2008 1:11 PM
To: Warden, Andrew (CIV); Henry, Terry (CIV); Subar, Judry (CIV)
Cc: Pinney, Jason S.
Subject: Habeas visit 27 October. RUSH Habeas Visit Request Form
Attachments: GTMO: Habeas Request Visit Form (10/08).DOC

Gents --

Please note this urgent request. I need your response by close of business tomorrow to the requests below.

Because of the urgency of the briefing calendar, we can manage only a single day's visit. We need to meet all of our clients together. We want:

1. To meet them all together, without chain link barriers or anyone chained.
2. There is a picnic table in iguana. We want to be able to sit there and/or in one of the huts. We want to be able to move freely from the table to a hut and back.
3. I want to be able to bring down copies of all the court filings and of recent newspaper articles and editorials that refer to Judge Urbina's decision or their case. There is not time to submit all that material for pre-screening. We have no problem with the contraband search.
4. We want to work through lunch.
5. No one who is not meeting with us should be confined in any way or required to stay inside one of the other huts.

Please confirm by close of business Tuesday that GTMO is agreeable to these requests. If we do not obtain confirmation, we will assume you object and proceed by emergency motion.

From: Pinney, Jason S.
Sent: Monday, October 20, 2008 12:15 PM
To: 'fostera@dodgc.osd.mil'
Cc: 'llenzas@dodgc.osd.mil'; Willett, P. Sabin; Andrew.Warden@usdoj.gov; 'rushan614@gmail.com'; Manning, Susan Baker; McGaraghan, Neil
Subject: RUSH Habeas Visit Request Form

Ms. Foster,

We are seeking a group meeting with our non-enemy combatant Uighur clients in Camp Iguana on Monday, October 27, 2008, one week from today. We specifically request that the meeting be allowed to take place in an open format in Camp Iguana, without chains or bars separating the parties. We recognize that this is an extraordinary request, but we feel that the government's concession that our clients are non-enemy combatants, along with the release order issued by the District Court, warrants granting of the request.

Please respond to this request by close of business tomorrow October 21, 2008. We do not wish to involve the Court in these matters, but will do so if necessary.

10/23/2008

<<GTMO: Habeas Request Visit Form (10/08).DOC>>

Jason S. Pinney | **B I N G H A M**

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