

EXHIBIT E

Warden, Andrew (CIV)

From: Warden, Andrew (CIV)
Sent: Wednesday, October 22, 2008 9:26 AM
To: 'Willett, P. Sabin'; 'fostera@dodgc.osd.mil'; 'llenzas@dodgc.osd.mil'; 'Pinney, Jason S.'
Cc: 'rushan614@gmail.com'; 'Manning, Susan Baker'; 'McGaraghan, Neil'; 'Heckerker@dodgc.osd.mil'
Subject: RE: GTMO visit -- logistical details issues

Sabin:

If you want to conduct a group meeting with more than one petitioner at the same time, there are only two options. First, as mentioned below, you may meet with a group of Uighurs in Camp Iguana provided you stay on the guard side of the fence at GTMO Iguana. Second, GTMO can move 6 of the Uighurs to the "movie room" in Camp 4. There are 6 bunks and a desk in this room. Each detainee will be restrained by a single-leg shackle to a bunk and you may sit at the desk while conducting your meeting. The movie room is an enclosed room without visual monitoring so guards will open the doors every few minutes to make mandatory safety checks during their rounds. Let me know if either of these options is acceptable.

Best,

Andrew

-----Original Message-----

From: Warden, Andrew (CIV)
Sent: Tuesday, October 21, 2008 7:17 PM
To: Willett, P. Sabin; fostera@dodgc.osd.mil; llenzas@dodgc.osd.mil; Pinney, Jason S.
Cc: rushan614@gmail.com; Manning, Susan Baker; McGaraghan, Neil; Heckerker@dodgc.osd.mil
Subject: RE: GTMO visit -- logistical details issues

Sabin:

We'll raise your proposals. Given the hour, however, we likely won't have a response until tomorrow.

Best,

Andrew

Andrew I. Warden
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave, NW
Washington, DC 20530
Tel: 202-616-5084
Fax: 202-616-8470

-----Original Message-----

From: Willett, P. Sabin [mailto:sabin.willett@bingham.com]
Sent: Tuesday, October 21, 2008 7:02 PM
To: Warden, Andrew (CIV); fostera@dodgc.osd.mil; llenzas@dodgc.osd.mil; Pinney, Jason S.
Cc: rushan614@gmail.com; Manning, Susan Baker; McGaraghan, Neil; Heckerker@dodgc.osd.mil
Subject: Re: GTMO visit -- logistical details issues

Andrew I had another idea that may make this easier.

Let us meet with everyone for a half hour in the manner you describe. Then let us meet with three guys in the morning in a hut. Another three over lunch. Three more in the afternoon. Then the group again at the end for half hour as you suggest

----- Original Message -----

From: Willett, P. Sabin

To: 'Warden, Andrew (CIV)' <Andrew.Warden@usdoj.gov>; Foster, Alva, Ms, DoD OGC <fostera@dodgc.osd.mil>; Llenza, Shannon, Ms, DoD OGC <llenzas@dodgc.osd.mil>; Pinney, Jason S.

Cc: rushan614@gmail.com <rushan614@gmail.com>; Manning, Susan Baker; McGaraghan, Neil; Hecker, Karen, Ms DoD OGC <Heckerk@dodgc.osd.mil>

Sent: Tue Oct 21 18:11:59 2008

Subject: RE: GTMO visit -- logistical details issues

we are close to a deal but I need some accommodation on the numbers.

i dont need to meet 17. I do need to meet at least a group of my nine clients. Let's say six.

and we need to meet together, not through fences, with the other guys not being confined. I think you can bisect the camp so that should work.

need to file in am so it would be great if we can reach agreement on this.

From: Warden, Andrew (CIV) [mailto:Andrew.Warden@usdoj.gov]

Sent: Tuesday, October 21, 2008 5:19 PM

To: Willett, P. Sabin; Foster, Alva, Ms, DoD OGC; Llenza, Shannon, Ms, DoD OGC; Pinney, Jason S.

Cc: rushan614@gmail.com; Manning, Susan Baker; McGaraghan, Neil; Hecker, Karen, Ms DoD OGC

Subject: RE: GTMO visit -- logistical details issues

Sabin:

As noted in Alva's e-mail, Guantanamo was able accommodate your requested visits dates on short notice. GTMO will also allow you to work through lunch on your meeting days. Further, GTMO will allow you to bring non-privileged newspaper articles and editorials about Judge Urbina's recent decision directly to the base on the condition that all material is subject to appropriate contraband review by GTMO in advance of your meetings. With respect to your request to meet with all 17 Uighurs at the same time, GTMO can accommodate that request subject to reasonable and appropriate safety and security measures. Specifically, you may meet with all 17 Uighurs in Camp Iguana provided you stay on the guard side of the fence at GTMO Iguana. The 17 Uighurs will be seated at three outdoor picnic table opposite the chain link fence, thereby allowing you to speak with all 17 at the same time and pass documents back and forth. For force protection and safety reasons, you must stay on the guard side of the fence. As you may be aware, guards do not patrol inside the detainees' portion of Camp Iguana and do no control the movement of the Uighurs while inside the camp. For that reason, consistent with prudent safety and security measures, GTMO cannot agree to accommodate your request to meet with all 17 Uighurs inside the detainee portion of Camp Iguana because the guards would not be able to respond in the event of an emergency or incident. Alternatively, you may meet with the Uighur petitioners individually in Camp Echo subject to the usual safety and security rules for such meetings.

Best,

Andrew

Andrew I. Warden

U.S. Department of Justice

Civil Division, Federal Programs Branch

20 Massachusetts Ave, NW

Washington, DC 20530

Tel: 202-616-5084

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From: Willett, P. Sabin [mailto:sabin.willett@bingham.com]
Sent: Tuesday, October 21, 2008 12:59 PM
To: Foster, Alva, Ms, DoD OGC; Llenza, Shannon, Ms, DoD OGC; Pinney, Jason S.
Cc: Warden, Andrew (CIV); rushan614@gmail.com; Manning, Susan Baker; McGaraghan, Neil;
Hecker, Karen, Ms DoD OGC
Subject: GTMO visit -- logistical details issues

Ms. Foster --

Many thanks.

We will have to make an emergency motion with the court tonight or first thing in the morning if we cannot get consent as to the specific requests. We would be happy to speak to the appropriate person if there are logistical details on which we might compromise.

Regards
SW

From: Foster, Alva, Ms, DoD OGC [mailto:fostera@dodgc.osd.mil]
Sent: Tuesday, October 21, 2008 12:55 PM
To: Willett, P. Sabin; Llenza, Shannon, Ms, DoD OGC; Pinney, Jason S.
Cc: Andrew.Warden@usdoj.gov; rushan614@gmail.com; Manning, Susan Baker; McGaraghan, Neil;
Hecker, Karen, Ms DoD OGC
Subject: RE: RUSH Habeas Visit Request Form

Good afternoon

Guantanamo has advised me that they can accomodate the logistics of your visit request for 10/26-10/28, however, a decision pertaining to your specific requests, as outlined in a prior e-mail, is still pending. Your visit is governed under the District Court Protective Order. I will send your combined theater/country clearance as soon as I receive it.

Alva C. Foster
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