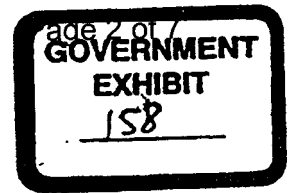


## **EXHIBIT B**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

STIPULATION

- v -

S(7) 98 Cr. 1023 (LBS)

USAMA BIN LADEN, et al.,

Defendants.

-----X

IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by Mary Jo White, United States Attorney for the Southern District of New York, Patrick J. Fitzgerald, Kenneth M. Karas, and Paul W. Butler, Assistant United States Attorneys, of counsel, and defendants, by and with the consent of their attorneys, as follows:

1. That on May 10, 2000, the residence of Nazim al Raghib, located in Manchester, the United Kingdom, was searched and the following items were seized by the

Government Exhibit Number

Bates Number

1650

UK/G29B-4

1675

UK/66\*-13 to 18

1676

UK/66\*-19 to 20

1677 (and 1677-T)

UK/BM-1 to 181 (and translation)

1678

UK/Q195-183

IT IS FURTHER STIPULATED AND AGREED that the other materials produced by the Government in discovery pertaining to these searches are also authentic photographs or other reproductions of items seized (or documents copied from computers

seized) from the premises.

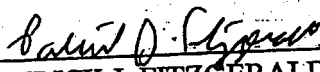
IT IS FURTHER STIPULATED AND AGREED that the Government and the defendants are agreeing to the authenticity of the documents as specifically described in paragraph 1 above and more generally in the preceding paragraph. The Government and the defense reserve the right to object to the admissibility of any particular item (or the translation of same), as each is offered. It is the purpose of this stipulation to avoid the necessity of calling (and recalling) multiple authentication witnesses at trial during the Government and defense cases.

IT IS FURTHER STIPULATED AND AGREED that this stipulation may be received in evidence as a Government Exhibit at trial.

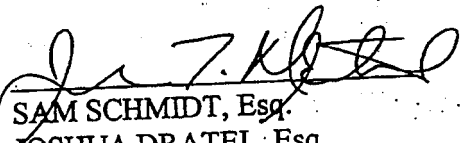
Dated: New York, New York  
March 20 2001

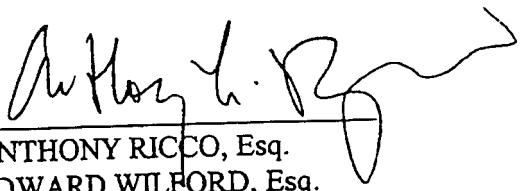
MARY JO WHITE

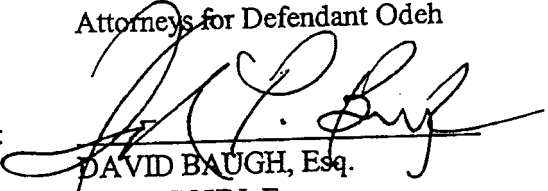
By:

  
PATRICK J. FITZGERALD  
KENNETH M. KARAS  
PAUL W. BUTLER  
Assistant United States Attorneys

By:

  
SAM SCHMIDT, Esq.  
JOSHUA DRATEL, Esq.  
Attorneys for Defendant Wadiah el Hage

By:   
ANTHONY RICCO, Esq.  
EDWARD WILFORD, Esq.  
CARL HERMAN, Esq.  
SANDRA BABCOCK, Esq.  
Attorneys for Defendant Odeh

By:   
DAVID BAUGH, Esq.  
FRED COHN, Esq.  
LAURA GASAROWSKI, Esq.  
Attorneys for Defendant al-'Owhali

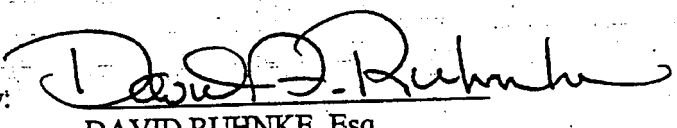
By:   
DAVID RUHNKE, Esq.  
DAVID STERN, Esq.  
Attorneys for Defendant Mohamed

EXHIBIT  
1677-T

**UK/BM-1 TRANSLATION**

IT IS FORBIDDEN TO REMOVE THIS FROM THE HOUSE

**UK/BM-176 TO UK/BM-180 TRANSLATION**  
**Lesson Eighteen**

**PRISONS AND DETENTION CENTERS**

**IF AN INDICTMENT IS ISSUED AND THE TRIAL BEGINS, THE BROTHER HAS TO PAY ATTENTION TO THE FOLLOWING:**

1. At the beginning of the trial, once more the brothers must insist on proving that torture was inflicted on them by State Security [investigators] before the judge.
  2. Complain [to the court] of mistreatment while in prison.
  3. Make arrangements for the brother's defense with the attorney, whether he was retained by the brother's family or court-appointed.
  4. The brother has to do his best to know the names of the state security officers, who participated in his torture and mention their names to the judge. [These names may be obtained from brothers who had to deal with those officers in previous cases.]
  5. Some brothers may tell and may be lured by the state security investigators to testify against the brothers [i.e. affirmation witness], either by not keeping them together in the same prison during the trials, or by letting them talk to the media. In this case, they have to be treated gently, and should be offered good advice, good treatment, and pray that God may guide them.
  6. During the trial, the court has to be notified of any mistreatment of the brothers inside the prison.
  7. It is possible to resort to a hunger strike, but it is a tactic that can either succeed or fail.
  8. Take advantage of visits to communicate with brothers outside prison and exchange information that may be helpful to them in their work outside prison [according to what occurred during the investigations]. The importance of mastering the art of hiding messages is self evident here.
- 
- ~~When the brothers are transported from and to the prison [on their way to the court] they should shout Islamic slogans out loud from inside the prison cars to impress upon the people and their family the need to support Islam.~~
  - Inside the prison, the brother should not accept any work that may belittle or demean him or his brothers, such as the cleaning of the prison bathrooms or hallways.
  - The brothers should create an Islamic program for themselves inside the prison, as well as recreational and educational ones, etc.
  - The brother in prison should be a role model in selflessness. Brothers should also pay attention to each others needs and should help each other and unite vis a vis the prison officers.
  - The brothers must take advantage of their presence in prison for obeying and worshipping [God] and memorizing the Qora'an, etc. This is in addition to all guidelines and procedures that were contained in the lesson on interrogation and investigation. Lastly, each of us has to understand that we don't achieve victory against our enemies through these actions and security procedures. Rather, victory is achieved by obeying Almighty and Glorious God and because of their many sins. Every brother has to be careful so as not to commit sins and everyone of us has to do his best in obeying Almighty God, Who said in his Holy Book: "We

will, without doubt, help Our messengers and those who believe (both) in this world's life and the one Day when the Witnesses will stand forth."  
May God guide us.

[Dedication]

To this pure Muslim youth, the believer, the mujahid (fighter) for God's sake, I present this modest effort as a contribution from me to pave the way that will lead to Almighty God and to establish a caliphate along the lines of the prophet.

The prophet, peace be upon him, said according to what was related by Imam Ahmed: "Let the prophecy that God wants be in you, yet God may remove it if He so wills, and then there will be a Caliphate according to the prophet's path [instruction], if God so wills it. He will also remove that [the Caliphate] if He so wills, and you will have a disobedient king if God so wills it. Once again, if God so wills, He will remove him [the disobedient king], and you will have an oppressive king. [Finally], if God so wills, He will remove him [the oppressive king], and you will have a Caliphate according to the prophet's path [instruction]. He then became silent."

#### THE IMPORTANCE OF TEAM WORK:

1. Team work is the only translation of God's command, as well as that of the prophet, to unite and not to disunite. Almighty God says, "And hold fast, all together, by the Rope which Allah (stretches out for you), and be not divided among yourselves." In "Sahih Muslim," it was reported by Abu Horairah, may Allah look kindly upon him, that the prophet, may Allah's peace and greetings be upon him, said: "Allah approves three [things] for you and disapproves three [things]: He approves that you worship him, that you do not disbelieve in Him, and that you hold fast, all together, by the Rope which Allah, and be not divided among yourselves. He disapproves of three: gossip, asking too much [for help], and squandering money."
2. Abandoning "team work" for individual and haphazard work means disobeying that orders of God and the prophet and falling victim to disunity.
3. Team work is conducive to cooperation in righteousness and piety.
4. Upholding religion, which God has ordered us by His saying, "Uphold religion," will necessarily require an all out confrontation against all our enemies, who want to recreate darkness. In addition, it is imperative to stand against darkness in all arenas: the media, education, [religious] guidance, and counseling, as well as others. This will make it necessary for us to move on numerous fields so as to enable the Islamic movement to confront ignorance and achieve victory against it in the battle to uphold religion. All these vital goals can not be adequately achieved without organized team work. Therefore, team work becomes a necessity, in accordance with the fundamental rule, "Duty cannot be accomplished without it, and it is a requirement." This way, team work is achieved through mustering and organizing the ranks, while putting the Amir (the Prince) before them, and the right man in the right place, making plans for action, organizing work, and obtaining facets of power . . . . .

# **EXHIBIT D**



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SUHAIL ABDU ANAM, et al.,

Petitioners,

v.

GEORGE W. BUSH, et al.,

Respondents.

Civil Action 04-01194 (HHK)

MEMORANDUM AND ORDER

Before the court is a “Motion for Temporary Restraining Order to Compel Government to Approve Request for Counsel Visit to Guantanamo Bay Detention Facility October 8–10, 2005,” filed by petitioners Emad Abdullah Hassan and Abdulaziz Abdoh Abdullah Ali Al Swidhi (collectively “Petitioners”). Also, incorporated within Petitioners’ motion is a request for an order that would require the Government to permit their counsel to conduct their visit with petitioner Hassan in the hospital facility in which he is being treated, and with petitioner Swidhi if he is similarly situated, rather than in an interview cell that has been set aside and designated for such purpose. Upon consideration of the motion and the record of this case, the court concludes that the motion should be denied without a hearing.

I.

Petitioners’ motion recites the concerns their counsel have for their physical welfare owing to Petitioners’ participation in a hunger strike that is taking place at the Guantanamo Bay Detention Facility. During a visit by counsel from August 29, 2005 to September 2, 2005, Petitioner Hassan informed his attorney that he had refused meals for almost three weeks, and, as

of the morning of his meeting with counsel, was also refusing water. Further, “[he] indicated to Counsel that he would continue the strike for as long as it would take to get a satisfactory response from the government.” Pet’rs’ Mot. at ¶3. Petitioner Swidhi informed counsel that he had been on the hunger strike for almost two weeks as of the time of meeting with counsel and “expressed his intention to stop taking water on September 9, 2005.” *Id.* at ¶4. According to counsel, “[h]e appeared gaunt and emaciated and much thinner than usual.” *Id.* (citing Ex. A, Affidavit of Douglas C. Cox, at ¶6).

Concerned about these developments, by a letter dated September 26, 2005, Petitioners’ counsel requested the “Government to keep them informed as to whether Petitioners are currently refusing meals, are currently hospitalized, if and when they may become hospitalized during the duration of the hunger strike, and if Petitioners receive intravenous fluids or are fed with the aid of a feeding tube at any time.” *Id.* at ¶5 (citing Ex. B, 9/26/05 Letter to Andrew Warden). Counsel also requested information relating to Petitioners’ medical treatment. *Id.* In response, the Government did not answer the specific questions posed by counsel, and, according to counsel, simply responded that “Guantanamo is appropriately monitoring and providing medical treatment as warranted to preserve detainees’ lives and health.” *Id.* (quoting Ex. C, 9/29/05 Letter to Pamela Chepiga).<sup>1</sup>

Given the Government’s “stonewalling” and because they learned from other habeas counsel who recently returned from Guantanamo that Petitioner Hassan was “continuing to

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<sup>1</sup> Petitioner’s characterization of the Government’s letter is inaccurate. The Government’s letter described in detail the process by which personnel at Guantanamo are monitoring each detainee’s daily intake of food and water, the manner in which the Government is reacting to any fast or hunger strike, as well as the logic underlying the Government’s refusal to provide continuous updates to Petitioners’ counsel. *See* Ex. C., 9/29/05 Letter to Pamela Rogers Chepiga.

participate in the hunger strike, was being held in the hospital and was being involuntarily forced,” *Id.* at ¶6 (citing Ex. A, Affidavit of Douglas C. Cox at ¶8), Petitioners’ counsel, on September 29, 2005, requested an expedited approval for a visit to Guantanamo to meet with Petitioners. The request was denied on September 30, 2005. This motion followed.

## II.

Petitioners’ motion is denied for three reasons. First, in order to obtain the extraordinary remedy of an injunction, the movant must demonstrate four elements: (1) substantial likelihood of success on the merits; (2) that he will suffer irrevocable injury if the injunction is not granted; (3) that the injunction will not sufficiently harm other interested parties; and (4) that the public interest will be furthered by the injunction. *Cobell v. Norton*, 391 F.3d 251, 258 (D.C. Cir. 2004). Petitioner’s motion fails to address or even attempt to address any of these elements.

While the court appreciates that the issues with which Petitioners are confronted are unique, they should not expect this court to rule favorably on any motion they might file that does not address governing legal principles. Needless to say, this court does not have a roving imprimatur to engage any concern Petitioners might have simply because it may appear to be a reasonable and correct thing to do.

Second, Judge Oberdorfer of this court recently addressed the issue of the appropriateness of this court’s intervention into the Government’s response to the hunger strike by Guantanamo Bay detainees. *El-Banna v. Bush*, 2005 U.S. Dist. LEXIS 21384 (D.D.C. Sept. 28, 2005). I agree with Judge Oberdorfer’s rationale denying the requested intervention in that case, which rationale, in large measure, is equally applicable to Petitioners’ request here.

Finally, the court is hard put to understand how Petitioners are entitled to injunctive relief to address an emergency situation which is of their own making and which they are able to set straight .

**III.**

For the above stated reasons, it is this 5th day of October, 2005, hereby,

**ORDERED** that Petitioners' Motion for Temporary Restraining Order to Compel Government to Approve Request for Counsel Visit to Guantanamo Bay Detention Facility October 8–10, 2005 (#131) is **DENIED**.

Henry H. Kennedy, Jr.  
United States District Judge