EXHIBIT 1
السفارة الأمريكية
قسم القنصليات
التركيا

التاريخ

عزبي مقدم الطلب، حيث يفيد هذا الطلب بخصوص بعثة اجتماعات للدبلوماسية الأمريكية، فأرسلت البعثة للدبلوماسية الأمريكية. لا نستطيع تنفيذ طلبكم في هذه النقطة.

الدبلوماسيون الرئيسيون الموظفون في هذا النظام الرئيسي وهم دبلوماسيون رئيسيون، ولكن ليس لديهم الحق في الاتصال بالدبلوماسيين الرئيسيين.

 dado L.2626 و 2628 F.7 و 6 F.7 و 2628 F.7 و 6 F.7


وaritha Inspector

Check Clearance Status

عند رؤية المرم الشفاف، يجب أن تتم الاتصال الرئيسي. (الرم الشفاف) أو الزجاج (الرم الشفاف) أو الزجاج (الرم الشفاف)

أرسلوا في الوقت المناسب: 02:00 الساعات. لذا، أطلب أكبت موعد مسبق.

يوجد طريق الطيارة لنسب دفع الزيادة من القيمة، في الهدف من ذلك.

أرسلوا في الوقت المناسب: 02:00 الساعات. لذا، أطلب أكبت موعد مسبق.

لذا، أطلب أكبت موعد مسبق.
Date: 10/9/2008

Dear Applicant:

By submitting your application, you have begun the process of obtaining a nonimmigrant visa. Our procedures require additional administrative processing which takes a minimum of four to six weeks but can take longer. Please refer to the following number _________ to check your status on our website. Administrative processing has been completed when your number appears on the website. Please do not call or e-mail to inquire about your case.

Please visit our website at:
then click on: “Check Clearance Status”

When your number appears on the website, please send your passport via the UPS courier service to the Embassy so that we may issue your visa.

In order to return your passport to the Embassy, please call UPS at 444 0033. If you have trouble reaching UPS, please dial 0 312 44 0033. The payment may be made in U.S. Dollars or Turkish Lira or by credit card.

After issuance of the visa, the passport will be delivered to your address in Turkey. There is NO other method of returning your passport. Please check with UPS to confirm delivery. If you have further questions on UPS service, please call UPS at the number shown above.

You should not pay the $131 application fee again. If you pay for a second application fee unnecessarily, we regret that it cannot be refunded.

Sincerely,

Non-Immigrant Visa Section
Ankara, Turkey
February 06, 2008
Case 1:08-cv-00827-GBL-JFA Document 410-1 Filed 05/06/13 Page 4 of 59 PageID# 6150
Date: \[10/9/2008\]

Dear Applicant:

By submitting your application, you have begun the process of obtaining a nonimmigrant visa. Our procedures require additional administrative processing which takes a minimum of four to six weeks but can take longer. Please refer to the following number \[PMU00\] to check your status on our website. Administrative processing has been completed when your number appears on the website. Please do not call or e-mail to inquire about your case.

Please visit our website at:
http://ankara.usembassy.gov,
then click on: “Check Clearance Status”

When your number appears on the website, please send your passport via the UPS courier service to the Embassy so that we may issue your visa.

In order to return your passport to the Embassy, please call UPS at 444 0033. If you have trouble reaching UPS, please dial 0 312 44 0033. The payment may be made in U.S. Dollars or Turkish Lira or by credit card.

After issuance of the visa, the passport will be delivered to your address in Turkey. There is NO other method of returning your passport. Please check with UPS to confirm delivery. If you have further questions on UPS service, please call UPS at the number shown above.

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Sincerely,

Non-Immigrant Visa Section
Ankara, Turkey
February 06, 2008
Case 1:08-cv-00827-GBL-JFA Document 410-1 Filed 05/06/13 Page 6 of 59 PageID# 6152

PMVφφ

السفارة الدبلوماسية
قسم القنصل
التركيا

التاريخ

عزيزي مقدم الطلب،

بعد مراجعة هذا الطلب، يتبين أن هناك بعض التعثرات في الإجراءات المطلوبة لاستلام طلبكم. السفارة تطلب منا مراجعة الشهادات وتأكيداً على منح التأشيرة للسفر.

لقد رافقنا طلبكم معلومات محدودة، ولكن لا يمكنني قبول الطلب قبل الحصول على الأدلة المناسبة. لذا، يتعين عليكم إرسال الملفات المطلوبة.

الرجاء تزويدي بالمعلومات التالية:

- روابط الطلب على الإنترنت:
  http://ankara.usembassy.gov
- شهادة التأشيرة:
  يجب أن تكون التأشيرة على مستوى الركيش.
- روابط الطلب:
  F2/2626 أو F1/7616 أو F1/7617
- الرجاء زيارة سفارة اسكتاندия:

وبعدها سأعمل على فتح طلبكم.

الرجاء إعادة الطلب من خلال جدول الزمن في تركيا أو من خلال الموقع الإلكتروني.

السبب:

- عدم إرسال جميع الملفات المطلوبة.
- عدم عقد ملاقات مع الممثلين الدبلوماسيين.
- عدم تقديم الشهادات المطلوبة.

الرجاء إعادة الطلب من خلال جدول الزمن في تركيا أو من خلال الموقع الإلكتروني.

الرجاء زيارة سفارة اسكتاندия:

http://ankara.usembassy.gov

وشكرًا.

Chwck Clearing Status

غود هاوسبک.
Date: 10/9/2008

Dear Applicant:

By submitting your application, you have begun the process of obtaining a nonimmigrant visa. Our procedures require additional administrative processing which takes a minimum of four to six weeks but can take longer. Please refer to the following number D15404 to check your status on our website. Administrative processing has been completed when your number appears on the website. Please do not call or e-mail to inquire about your case.

Please visit our website at:
http://ankara.usembassy.gov, then click on: “Check Clearance Status”

When your number appears on the website, please send your passport via the UPS courier service to the Embassy so that we may issue your visa.

In order to return your passport to the Embassy, please call UPS at 444 0033. If you have trouble reaching UPS, please dial 0 312 44 0033. The payment may be made in U.S. Dollars or Turkish Lira or by credit card.

After issuance of the visa, the passport will be delivered to your address in Turkey. There is NO other method of returning your passport. Please check with UPS to confirm delivery. If you have further questions on UPS service, please call UPS at the number shown above.

You should not pay the $131 application fee again. If you pay for a second application fee unnecessarily, we regret that it cannot be refunded.

Sincerely,

Non-Immigrant Visa Section
Ankara, Turkey
February 06, 2008
<table>
<thead>
<tr>
<th>Item</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passport Number</td>
<td>G2008226</td>
</tr>
<tr>
<td>Place of Issue</td>
<td>Baghdad, IRAQ</td>
</tr>
<tr>
<td>Issuing Country</td>
<td>IRAQ</td>
</tr>
<tr>
<td>Date of Issue</td>
<td>23 JUNE 2008</td>
</tr>
<tr>
<td>Date of Expiration</td>
<td>22 JUNE 2016</td>
</tr>
<tr>
<td>Sex</td>
<td>Male</td>
</tr>
<tr>
<td>National ID Number</td>
<td>00564507</td>
</tr>
<tr>
<td>Home Address</td>
<td>Baghdad, Baghdad 10080, IRAQ</td>
</tr>
<tr>
<td>Home Telephone Number</td>
<td></td>
</tr>
<tr>
<td>Business Telephone Number</td>
<td></td>
</tr>
<tr>
<td>Mobile/Cell Number</td>
<td></td>
</tr>
<tr>
<td>Business Fax Number</td>
<td></td>
</tr>
<tr>
<td>Spouse's Full Name</td>
<td></td>
</tr>
<tr>
<td>Spouse's Date of Birth</td>
<td>25 JANUARY 1962</td>
</tr>
<tr>
<td>Spouse's DOD</td>
<td></td>
</tr>
<tr>
<td>Marital Status</td>
<td>Married</td>
</tr>
<tr>
<td>Date of Separation</td>
<td></td>
</tr>
<tr>
<td>Present Occupation</td>
<td></td>
</tr>
<tr>
<td>Future Plans in U.S.</td>
<td>To appear as a witness in litigation</td>
</tr>
<tr>
<td>Future Address</td>
<td></td>
</tr>
<tr>
<td>Person to Notify in Event of Emergency</td>
<td>Burke O'Neil LLC</td>
</tr>
</tbody>
</table>

**Date of Birth:**
11 OCTOBER 1959

**Privacy Notice:** This form contains questions that may be considered sensitive by some individuals. The information you provide is subject to the Privacy Act and other laws, including disclosure to other U.S. Government agencies. This information is necessary for us to process your request. If you do not provide the information requested, we may not be able to process your request. If you have questions about how your information will be used, please contact the designated officer listed on the cover page of this form. Your rights to privacy are protected by the Privacy Act of 1974. The law requires us to use and disclose your information only for the purpose for which it was collected, unless you agree to another use or disclosure. We may disclose your information to other U.S. Government agencies and international organizations that have a legal right to receive it. We may also disclose your information if required by law or a court order. We may make your information available to any person to whom you authorize us to disclose it. Your information may be stored electronically on a computerized database. Your information will not be sold or used for commercial purposes. To request access to your information, you must submit a written request to the designated officer listed on the cover page of this form. Your request will be processed within a reasonable time. You may be charged a fee for the cost of copying and mailing your information. You may request to correct or update your information. You may request to restrict the use and disclosure of your information. You may request to have your information transferred to you. You may request to have your information permanently removed from our records. You may request to have your information transferred to another agency. You may request to have your information transferred to another agency. You may request to have your information transferred to another agency.
<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>30. Have you ever been issued a U.S. visa?</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>WHERE?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WHAT TYPE OF VISA?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>32. Do you intend to work in the U.S.?</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>IF YES, give the name and complete address of employer.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>33. Do you intend to study in the U.S.?</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>IF YES, give the name and complete address of the school.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>34. Names and relationships of persons traveling with you</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Taha Yaseen Arrak, no relation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asaad Hamzah Hantoosh, no relation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Salah Hassan, no relation</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>36. Have you ever been refused a U.S. visa?</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>WHERE?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WHAT TYPE OF VISA?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>37. Are any of the following persons in the U.S., or do they have U.S.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>legal permanent resident or U.S. citizen?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MARK ☑️ or ☐ and indicate that person’s status in the U.S. (i.e., U.S.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>legal permanent resident, U.S. citizen, visiting, studying,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>working, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Husband/ Wife</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>☑️ Father/ Son</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>☑️ Brother/ Sister</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>38. IMPORTANT: ALL APPLICANTS MUST READ AND CHECK THE APPROPRIATE BOX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>FOR EACH ITEM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A visa may not be issued to persons who are within specific categories</td>
<td></td>
<td></td>
</tr>
<tr>
<td>defined by law as inadmissible in the United States (except</td>
<td></td>
<td></td>
</tr>
<tr>
<td>when a waiver is obtained in advance), or any of the following</td>
<td></td>
<td></td>
</tr>
<tr>
<td>applicable to you:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Have you ever been arrested or convicted for any offense or crime,</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>even though subject of a pardon, amnesty or other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>similar legal action?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Have you ever been detained in the U.S. or been a subject of a</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>deportation hearing, or sought to obtain or assist others to</td>
<td></td>
<td></td>
</tr>
<tr>
<td>obtain a visa, enter into the U.S., or any other U.S.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>immigration benefit by fraud or willful</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>misrepresentation or other unlawful means?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Have you ever participated in persecutions directed by the Nazi</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>government of Germany; or</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Have you ever participated in genocide?</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>☑️ Have you ever violated the terms of a U.S. visa, or been unlawfully</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>present in, or deported from, the United States?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Have you ever withheld custody of a U.S. citizen child outside</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>the United States from a person granted legal custody by a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>U.S. court, or in the United States in violation of any law of</td>
<td></td>
<td></td>
</tr>
<tr>
<td>regulation, or renounced U.S. citizenship for the purpose of</td>
<td></td>
<td></td>
</tr>
<tr>
<td>avoiding taxation?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☑️ Have you ever been afflected with a communicable disease of</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>public health significance or a dangerous physical or mental</td>
<td></td>
<td></td>
</tr>
<tr>
<td>disorder, or ever been a drug addict or addicted?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>While the above answers do not automatically signify ineligibility for a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>visa, if you answered YES you may be required to personally</td>
<td></td>
<td></td>
</tr>
<tr>
<td>appear before a consular officer</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>39. Was this application prepared by another person on your behalf?</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>(If answer is YES, then please attach complete Form DS-160)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>40. Application prepared by:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NAME: Burke O'Neill LLC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ADDRESS: 1718 20th Street NW, Washington, DC 20009</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Signature of person preparing form</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DATE (mm/dd/yyyy)</td>
<td>7/10/08</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>41. I certify that I have read and understood all the questions set</td>
<td></td>
<td></td>
</tr>
<tr>
<td>forth in this application and the answers I have furnished on this</td>
<td></td>
<td></td>
</tr>
<tr>
<td>form are true and correct to the best of my knowledge and belief.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand that any false or misleading statement may result in</td>
<td></td>
<td></td>
</tr>
<tr>
<td>the permanent refusal of a visa or denial of entry into the United</td>
<td></td>
<td></td>
</tr>
<tr>
<td>States. I understand that possession of a visa does not automatically</td>
<td></td>
<td></td>
</tr>
<tr>
<td>enable the bearer to enter the United States of America upon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>arrival at a port of entry if he or she is found inadmissible.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>42. Applicant’s Signature</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DATE (mm/dd/yyyy)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Privacy Act and Paperwork Reduction Act Statements

1. NIA Section 222(g) provides that visa issuance and refusals records shall be considered confidential and shall be used only for the formulation, administration, enforcement of the immigration, national, and other laws of the United States. Certified copies of visa records may be made available to a court which orders that the information contained in each record is not made available to the public.

2. Public reporting burden for this collection of information is estimated to take 1 hour per response, including time required for reviewing existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless the collection displays a currently valid OMB control number. Send comments on the accuracy of the estimate of the burden and recommendations for reducing it to: U.S. Department of State, OMB Control No. 1692-0162, Washington, DC 20520.
U.S. Department of State  
SUPPLEMENT TO  
NONIMMIGRANT VISA APPLICATION  

PLEASE BE SURE TO SUBMIT THIS PAGE WITH THE REST OF YOUR APPLICATION  

DO NOT MARK OR WRITE IN THIS SPACE  

Suhail Najm Abdullah Shammar  

Barcode Number: N1MI18HW5K  

<table>
<thead>
<tr>
<th>29. Additional Visits to the U.S.:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>30. Additional Visa Issuances:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>31. Additional Visa Refusals:</th>
</tr>
</thead>
</table>
**SUPPLEMENTAL NONIMMIGRANT VISA APPLICATION**

**PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM. ATTACH AN ADDITIONAL SHEET IF YOU NEED MORE SPACE TO CONTINUE YOUR ANSWERS.**

1. Last Name(s) (List all Spelling(s))
   - Shammar

2. First Name(s) (List all Spelling(s))
   - Suhail

3. Full Name (in Native Alphabet)
   - سهيل ناجم عبد الله

4. Clan or Tribe Name (if applicable)
   - Shammar

5. Spouse's Full Name (if Married)
   - [Redacted]

6. Father's Full Name
   - [Redacted]

7. Mother's Full Name
   - [Redacted]

8. Full Name and Address of Contact Person or Organization in the United States (Include Telephone Number)
   - William O'Neil
     - 1100 20th Street NW
     - Washington, DC 20006
     - Telephone: 202-232-5564

9. List All Countries You Have Entered in the Last Ten Years (Give the Year of Each Visit)
   - Turkey, 2008

10. List All Countries That Have Issued You a Passport
    - Iraq

11. Have You Ever Lost a Passport or Had One Stolen?
    - No

12. Not Including Current Employer, List Your Last Two Employers
    - **Name**
      - Self-employed
      - Iraqi Army
    - **Address**
      - [Redacted]
    - **Telephone No.**
      - [Redacted]
    - **Job Title**
      - Farmer
      - Iraqi Reserve Officer
    - **Supervisor's Name**
      - [Redacted]
    - **Date of Employment**
      - 1993-2008
      - 1993-1993

13. List All Professional, Social and Charitable Organizations to Which You Belong (Belonged) or Contribute (Contribute) or with Which You Work (Have Worked)
    - [Redacted]

14. Do You Have Any Specialized Skills or Training, Including-Paint, explosives, nuclear, biological, or chemical substances?
    - No

15. Have You Ever Served in Military Service?
    - Yes
    - Iraqi, Iraqi Reserve Officer, Captain, artillery, 1983-1993

16. Have You Ever Been in an Armed Conflict, Either as a Participant or Victim?
    - Yes
    - Served as Iraqi Reserve Officer during Iraq/Iran War

17. List All Educational Institutions You Attend or Have Attended. Include Vocational Institutions But Not Elementary Schools
    - **Name of Institution**
      - Baghdad University
      - Basraa, Baghdad
    - **Course of Study**
      - College of Education/Mathematics Dept.
      - 1974-1979
    - **Dates of Attendance**
      - 1974-1979

18. Have You Made Specific Travel Arrangements?
    - Yes
    - If YES, please provide a detailed itinerary for your trip, including arrival/departure dates, flight information, specific locations you will visit, and a point of contact at each location.

---

**Paperwork Reduction Act Statement**

"Filing this form burden for the collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the OMB clearance. You are not required to provide the information unless a federal agency has instructed you to. Please do not provide information unless it is required. If you have comments on the accuracy of this estimate of the burden and recommendations for reducing it, please contact the U.S. Department of State, APRSDIR, Washington, DC 20520."
Mandatory Iraq-Specific Supplemental Visa Form

In order to ensure prompt processing of your visa application, please be as detailed as possible in completing the Supplemental Nonimmigrant Visa Application (DS-157) in order to prevent delays in processing your application. Please do not leave any questions blank. If a question does not apply to you, indicate "N/A." Do not answer questions "N/A" if the appropriate response is "None" or "No." Some questions are composite and require responses to each component of the question.

Question 3: Please write your name in Arabic here.

Question 12: Please list all of your employers since you completed your studies and provide the dates for this employment, and your job title for each job.

<table>
<thead>
<tr>
<th>NAME OF EMPLOYER/ COMPANY/ LOCATION</th>
<th>YOUR JOB TITLE</th>
<th>DATES EMPLOYED FROM - TO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al South Secondary School</td>
<td>teacher</td>
<td>2008 - present</td>
</tr>
<tr>
<td>Self-employed</td>
<td>Farmer</td>
<td>1993-2003</td>
</tr>
<tr>
<td>Iraqi Army</td>
<td>Iraqi reserve officer</td>
<td>1983-1993</td>
</tr>
</tbody>
</table>

Question 13: The Ba'ath Party is considered a professional organization. If you were ever a member of the Ba'ath Party, please indicate it in response to this question. If you were a member, please explain when and why you joined, and the highest Party level you achieved. If not, please explain how you avoided Party membership.

I joined the Ba'ath Party while in secondary school (1993). At that time, I believed that I could not get a job without being a member. I was a regular Party member.

Question 15: If you are a male and have not performed military service, please explain how you avoided mandatory military service in Iraq.

N/A - served as an Iraqi Reserve Officer

Updated on 12/17/2007
Case 1:08-cv-00827-GBL-JFA   Document 410-1   Filed 05/06/13   Page 13 of 59 PageID# 6159

**U.S. Department of State**

**NONIMMIGRANT VISA APPLICATION**

Please type or print your answers in the space provided below each item.

<table>
<thead>
<tr>
<th>1. Passport Number</th>
<th>2. Place of Issuance</th>
<th>Country</th>
<th>3. Issuing Country</th>
<th>4. Issued Date (mm/dd/yyyy)</th>
<th>5. Expiration Date (mm/dd/yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>G2258066</td>
<td>Baghdad</td>
<td>IRAQ</td>
<td>IRAQ</td>
<td>18 AUGUST 2008</td>
<td>17 AUGUST 2015</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. Surname(s) [As in Passport]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arrak</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7. First and Middle Names [As in Passport]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Taha Yaseen Arrak</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>8. Other Surnames Used (Maiden, Religious, Professional, Aliases)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>9. Other First and Middle Names Used</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>10. Date of Birth (mm/dd/yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 DECEMBER 1981</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11. Place of Birth:</th>
<th>Country</th>
<th>State/Province</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghdad</td>
<td>IRAQ</td>
<td>Baghdad</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>12. Nationality</th>
</tr>
</thead>
<tbody>
<tr>
<td>IRAQ</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>13. Sex</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Male</td>
</tr>
<tr>
<td>☐ Female</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>14. National Identification Number [if applicable]</th>
</tr>
</thead>
<tbody>
<tr>
<td>00517410</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>15. Home Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghdad, Baghdad 10080 IRAQ</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>16. Home Telephone Number</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>17. Marital Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Married</td>
</tr>
<tr>
<td>☐ Single (Never Married)</td>
</tr>
<tr>
<td>☐ Widow</td>
</tr>
<tr>
<td>☐ Divorced</td>
</tr>
<tr>
<td>☐ Separated</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>18. Spouse’s Full Name [Name is divorced or separated, include maiden name]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>19. Spouse’s DOB and Gender [If applicable]</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 JULY 1981</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>20. Name and Address of Present Employer or School</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: self-employed</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>21. Present Occupation [If retired, write &quot;retired&quot;. If student, write &quot;student&quot;.]</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>22. When Do You Intend To Arrive In The U.S.? [Provide specific date if knowing]</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>23. Email Address</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>24. At What Address Will You Stay In The U.S.?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1715 20th Street NW Washington, DC 20009</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>25. Name and Telephone Numbers of Person In U.S. Who You Will Be Staying With or Visiting for Tourism or Business</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>26. How Long Do You Intend To Stay In The U.S.?</th>
</tr>
</thead>
<tbody>
<tr>
<td>one week</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>27. What’s The Purpose of Your Trip?</th>
</tr>
</thead>
<tbody>
<tr>
<td>To appear as a witness in litigation</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>28. Who Will Pay For Your Trip?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Burke O'Neil LLC</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>29. Have You Ever Been In The U.S.?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>30. WHEN?</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>31. FOR HOW LONG?</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>32. DO NOT WRITE IN THIS SPACE</th>
</tr>
</thead>
<tbody>
<tr>
<td>X1MI1XYTZY</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>33. USGSPhone</th>
</tr>
</thead>
<tbody>
<tr>
<td>202-232-5504</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>34. Photo (If applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>stapled or glued photo here</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>35. PREVIOUS EDITION OBSOLETE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 1 of 2</td>
</tr>
</tbody>
</table>
30. Have you ever been issued a U.S. visa? ☐ Yes ☑ No  
WHERE?
WHAT TYPE OF VISA?

31. Have you ever been refused a U.S. visa? ☐ Yes ☑ No
WHERE?
WHAT TYPE OF VISA?

32. Do you intend to work in the U.S.? ☐ Yes ☑ No 
☐ IF YES, give the name and complete address of the employer.

33. Do you intend to study in the U.S.? ☐ Yes ☑ No 
☐ IF YES, give the name and complete address of the school.

34. Names and relationships of persons traveling with you:
Suhaib Najib Abdullah, no relation  
Asaad Hamzah Hanifou, no relation  
Salah Hasan Naaff, no relation

35. Has your U.S. visa ever been cancelled or revoked? ☐ Yes ☑ No  
☐ IF YES, give the name and complete address of the employer.

36. Are any of the following persons in the U.S., or do they have U.S. legal permanent residence or U.S. citizenship?  
☐ YES ☑ NO Mark YES or NO and indicate that person's status in the U.S. (i.e., U.S. legal permanent resident, U.S. citizen, visiting, studying, working, etc.).
☐ YES ☑ NO Husband/Kids  
☐ YES ☑ NO Father/Mother  
☐ YES ☑ NO Son/Daughter

38. IMPORTANT: ALL APPLICANTS MUST READ AND CHECK THE APPROPRIATE BOX FOR EACH ITEM.
☐ Have you ever been arrested or convicted for any offense or crime, even though subject of a pardon, amnesty or other similar legal action? ☐ Yes ☑ No  
☐ Have you ever been unlawfully absent in or out of this country? ☐ Yes ☑ No  
☐ Have you ever been a prostitute or engaged in any other sex-related or related activities? ☐ Yes ☑ No  
☐ Have you ever been refused admission to the United States or been the subject of a deportation order, or convicted or sentenced to a prison term, or been a part owner of a drug smuggling, trafficking, or other criminal enterprise? ☐ Yes ☑ No

39. Was this application prepared by another person? ☐ Yes ☑ No  
☐ IF YES, then have that person explain their role.

40. Application Prepared By:  
NAME: Burke O'Neill LLC  
ADDRESS: 1716 20th Street NW, Washington, DC 20009
Signature of Person Preparing Form:

41. I certify that I have read and understood all of the questions set forth in this application and the answers I have furnished on this form are true and complete to the best of my knowledge and belief. I understand that any false or misleading statement may result in the permanent refusal of a visa or denial of entry into the United States. I understand that possession of a visa does not automatically enable the holder to enter the United States of America upon arrival at a port of entry, if no or she is found ineligible.

APPLICANT'S SIGNATURE:

Privacy Act and Paperwork Reduction Act Statements

INA Section 222(f) provides that visa issuance and refusal records shall be considered confidential and shall be used only for the purpose of immigration, administration, or enforcement of the Immigration and Nationality, and other laws of the United States. Certain copies of these records may be made available to a court, which certifies that the information contained in each record is needed in the case pending before the court.

Public reporting burden for the collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, and reviewing the final collection. You do not have to provide the information unless you consent to collection. This collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to the U.S. Department of State, ARPS/OIR, Washington, DC 20520.
U.S. Department of State
SUPPLEMENT TO
NONIMMIGRANT VISA APPLICATION

PLEASE BE SURE TO SUBMIT THIS PAGE WITH THE REST OF YOUR APPLICATION
DO NOT MARK OR WRITE IN THIS SPACE

Taha Yaseen Arrak Arrak

Barcode Number: X1M1XYTZY

29. Additional Visits to the U.S.:

30. Additional Visa Issuances:

31. Additional Visa Refusals:
# SUPPLEMENTAL NONIMMIGRANT VISAA APPLICATION

Please type or print your answers in the space provided below each item. Please attach an additional sheet if you need more space to continue your answers.

## Applicant Information

<table>
<thead>
<tr>
<th>Last Name(s) (Last of Spelling)</th>
<th>Taha Yaseen Arrak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Given Name(s) (Last of Spelling)</td>
<td></td>
</tr>
<tr>
<td>Father's Full Name</td>
<td></td>
</tr>
<tr>
<td>Son/spouse's Full Name (If Married)</td>
<td></td>
</tr>
<tr>
<td>Mother's Full Name</td>
<td></td>
</tr>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Date of Birth</td>
<td></td>
</tr>
<tr>
<td>Place of Birth</td>
<td></td>
</tr>
</tbody>
</table>

## Current Address

<table>
<thead>
<tr>
<th>Street Address</th>
<th>P.O. Box Number</th>
<th>City, State, ZIP Code</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Contact Person or Organization in the United States

<table>
<thead>
<tr>
<th>Name</th>
<th>William O'Neil</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>1718 20th Street NW</td>
</tr>
<tr>
<td>City, State, ZIP Code</td>
<td>Washington, DC 20009</td>
</tr>
</tbody>
</table>

## Contact Telephone Numbers

<table>
<thead>
<tr>
<th>Telephone</th>
<th>202-232-5504</th>
</tr>
</thead>
</table>

## Countries Visited

<table>
<thead>
<tr>
<th>Country</th>
<th>Turkey, 2003</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Iraq</td>
</tr>
</tbody>
</table>

## Employment History

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Address</th>
<th>Telephone No.</th>
<th>Job Title</th>
<th>Supervisor's Name</th>
<th>Dates of Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-employed Farmer</td>
<td>no other previous employers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Professional, Social, and Charitable Organization

<table>
<thead>
<tr>
<th>Category</th>
<th>Organization Name</th>
<th>Dates of Membership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Military Service

<table>
<thead>
<tr>
<th>Country</th>
<th>Iraq, Compulsory Service, soldier, no specialty, sept. 1999 - 2003</th>
</tr>
</thead>
</table>

## Education

<table>
<thead>
<tr>
<th>Institution</th>
<th>Address</th>
<th>Telephone No.</th>
<th>Course of Study</th>
<th>Dates of Attendance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>No education above elementary school (Al Ruashid Primary School)</td>
</tr>
</tbody>
</table>

## Travel Arrangements

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Paperwork Reduction Act Statement

This document was printed on recycled paper.
Mandatory Iraq - Specific Supplemental Visa Form

In order to ensure prompt processing of your visa application, please be as detailed as possible in completing the Supplemental Nonimmigrant Visa Application (DS-157) in order to prevent delays in processing your application. Please do not leave any questions blank. If a question does not apply to you, indicate "N/A." Do not answer questions "N/A" if the appropriate responses are "None" or "No." Some questions are composite and require responses to each component of the question.

Question 8: Please write your name in Arabic here.

Question 12: Please list all of your employers since you completed your studies and provide the dates for this employment and your job title for each job.

<table>
<thead>
<tr>
<th>NAME OF EMPLOYER/COMPANY/LOCATION</th>
<th>YOUR JOB TITLE</th>
<th>DATES EMPLOYED FROM - TO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-employed</td>
<td>farmer</td>
<td>1993- present</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Question 13: The Ba’ath Party is considered a professional organization. If you were ever a member of the Ba’ath Party, please indicate it in response to this question. If you were a member, please explain when and why you joined, and the highest Party level you achieved. If not, please explain how you avoided Party membership.

I joined the Ba’ath Party in 2000 and was a member at the lowest level (Muqaydat). During Saddam Hussein’s regime, every soldier in compulsory service had to join the Ba’ath Party.

Question 15: If you are a male and have not performed military service, please explain how you avoided mandatory military service in Iraq.

N/A - served in Iraqi military

Updated on 12/17/2007
**U.S. Department of State**

**NONIMMIGRANT VISA APPLICATION**

**CASE:** 08-cv-00827-GBL-JFA   DOCUMENT 410-1   FILED 05/06/13   PAGE 18 OF 59   PAGEID# 6164

**PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM**

<table>
<thead>
<tr>
<th>Item</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Passport Number</td>
<td>G2339256</td>
</tr>
<tr>
<td>2. Place of Issuance</td>
<td>City: Baghdad</td>
</tr>
<tr>
<td>3. Issuing Country</td>
<td>IRAQ</td>
</tr>
<tr>
<td>4. issuance Date (mm/dd/yyyy)</td>
<td>14 SEPTEMBER 2008</td>
</tr>
<tr>
<td>5. Expiration Date (mm/dd/yyyy)</td>
<td>13 SEPTEMBER 2016</td>
</tr>
<tr>
<td>6. Surnames (As in Passport)</td>
<td>Aminni</td>
</tr>
<tr>
<td>7. First and Middle Names (As In Passport)</td>
<td>Asaad Hamzan Hanfoosh</td>
</tr>
<tr>
<td>8. Other Surnames Used ( Maiden, Religious, Professional, Alias)</td>
<td></td>
</tr>
<tr>
<td>9. Other First and Middle Names Used</td>
<td></td>
</tr>
<tr>
<td>10. Date of Birth (mm/dd/yyyy)</td>
<td>01 JULY 1973</td>
</tr>
<tr>
<td>11. Place of Birth</td>
<td>City: Baghdad</td>
</tr>
<tr>
<td>12. Nationality</td>
<td>IRAQ</td>
</tr>
<tr>
<td>13. Sex</td>
<td>Male</td>
</tr>
<tr>
<td>14. National Identification Number</td>
<td>01146055</td>
</tr>
<tr>
<td>15. Home Address (include apartment number, street, city, state or province, postal code and country)</td>
<td>Baghdad, Baghdad 10860</td>
</tr>
<tr>
<td>16. Home Telephone Number</td>
<td>IRAQ</td>
</tr>
<tr>
<td>17. Marital Status</td>
<td>Married</td>
</tr>
<tr>
<td>18. Spouse's Full Name (even if divorced or separated, include maiden name)</td>
<td></td>
</tr>
<tr>
<td>19. Spouse's DOB (mm/dd/yyyy)</td>
<td>01 MAY 1972</td>
</tr>
<tr>
<td>20. Name and Address of Present Employer or School (If self-employed)</td>
<td></td>
</tr>
<tr>
<td>21. Present Occupation (If retired, write &quot;retired&quot;. If student, write &quot;student&quot;)</td>
<td>Livestock seller</td>
</tr>
<tr>
<td>22. Which Do You Intend To Arrive In The U.S.? (Provide specific date if known)</td>
<td></td>
</tr>
<tr>
<td>23. Entrance Address</td>
<td></td>
</tr>
<tr>
<td>24. At What Address Will You Stay In The U.S.?</td>
<td>1718 20th Street NW  Washington, DC 20009</td>
</tr>
<tr>
<td>25. Name and Telephone Numbers of Person in U.S. Who You Will Be Staying With or Visiting For Tourism or Business</td>
<td>William O'Neil  Home Phone: BUSINESS PHONE: 202-232-5504</td>
</tr>
<tr>
<td>26. How Long Do You Intend To Stay In The U.S.?</td>
<td>1 week</td>
</tr>
<tr>
<td>27. What Is The Purpose Of Your Trip?</td>
<td>To appear as a witness in litigation</td>
</tr>
<tr>
<td>28. Who Will Pay For Your Trip?</td>
<td>Burke O'Neil LLC</td>
</tr>
<tr>
<td>29. Have You Ever Been In The U.S.?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Photo**

- **50 mm x 50 mm**
- **staple or glue photo here**

**E1MI1FPRR8**
30. Have you ever been issued a U.S. Visa?  
   ☐ Yes  ☑ No
   WHAT TYPE OF VISAS?  
   ☐ Yes  ☑ No

31. Have you ever been refused a U.S. Visa?  
   WHERE?  
   ☐ Yes  ☑ No

32. Do you intend to work in the U.S.?  
   ☐ Yes  ☑ No
   IF YES, give the name and complete address of the employer.  
   ☐ Yes  ☑ No

33. Do you intend to study in the U.S.?  
   ☐ Yes  ☑ No
   IF YES, give the name and complete address of the school.  
   ☐ Yes  ☑ No

34. Names and relationships of persons traveling with you:  
   Suhaib Najm Abdullah, no relation  
   Taha Yaseen Arrak, no relation  
   Salah Hasan Nauf, no relation  

35. Have your U.S. Visa ever been cancelled or revoked?  
   ☐ Yes  ☑ No

36. Has anyone ever filed an immigrant visa petition on your behalf?  
   ☐ Yes  ☑ No

37. Are any of these persons in the U.S. or do they have a legal permanent resident or U.S. citizenship?  
   ☐ Yes  ☑ No

38. IMPORTANT: ALL APPLICANTS MUST READ AND CHECK THE APPROPRIATE BOX FOR EACH ITEM.
   A visa may not be issued to persons who are within specified categories defined by law as inadmissible to the United States, except when a waiver is obtained in advance. Be any of the following applicable to you:
   ☐ Yes  ☑ No

   - Have you ever been a member of a terrorist organization or a member of a terrorist organization as directly designated by the U.S. Secretary of State? Have you ever participated in persecutions directed by the host government of Germany, or have you ever participated in genocide?
   - Have you ever been arrested or convicted for any offense or crime, even though subject of a pardon, amnesty or other similar legal action?
   - Have you ever unlawfully distributed or sold a controlled substance (drug), or been a prostitute or procured women or girls for prostitution?
   - Have you ever been refused admission to the U.S., or been the subject of a deportation hearing, or sought to obtain or assist others to obtain a visa, entry into the U.S., or any other unlawful means?
   - Have you ever attended a public secondary school outside the United States without formal or regular class attendance?
   - Have you ever participated in activities that are part of a U.S. citizen child outside the United States?
   - Have you ever been a member of a U.S. citizen child?
   - Have you ever been a member of a U.S. citizen child?
   - Have you ever been a member of a U.S. citizen child?
   - Have you ever been a member of a U.S. citizen child?
   - Have you ever been a member of a U.S. citizen child?

While a YES answer does not automatically signify inadmissibility for a visa, if you answered YES you may be required to personally appear before a consular officer.

39. Was this Application Prepared by Another Person on Your Behalf?  
   ☐ Yes  ☑ No

40. Application Prepared by:  
   NAME:  
   ADDRESS:  
   DATE  

41. I certify that I have read and understood all the questions set forth in this application and the answers I have furnished on this form are true and correct to the best of my knowledge and belief. I understand that any false or misleading statement may result in the permanent refusal of a visa or the invalidation of a visa issued to me on the United States of America upon arrival at a port of entry if it or this is found inadmissible.

APPLICANT'S SIGNATURE  

Privacy Act and Paperwork Reduction Act Statements

INA Section 222(f) provides that visa issuance and refusal records shall be considered confidential and shall be used only for the purposes of: investigation, detention, administration, or enforcement of the immigration, citizenship, and naturalization laws of the United States. Certification copies of visa records may be made available to a court which certifies that the information contained in such records is needed in a case pending before the court.

Public reporting burden for the collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, preparing the information required, and reviewing the final documents. You do not have to provide the information unless it is required by this statute. Please comment on the accuracy of this estimate or suggestions for reducing burden to: U.S. Department of State, Office of Management, Room 3206, 1211 23rd Street NW., Washington, DC 20520.
**U.S. Department of State**  
**SUPPLEMENT TO**  
**NONIMMIGRANT VISA APPLICATION**

---

**PLEASE BE SURE TO SUBMIT THIS PAGE WITH THE REST OF YOUR APPLICATION**

**DO NOT MARK OR WRITE IN THIS SPACE**

Asaad Hamzah Hanfoosh Alnamri

Barcode Number: E1M11FPRS8

<table>
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<th>Description</th>
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<td>Additional Visa Issuances:</td>
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<tr>
<td>31.</td>
<td>Additional Visa Refusals:</td>
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</table>
Supplemental Nonimmigrant Visa Application

Please type or print your answers in the space provided below each item. Please attach an additional sheet if you need more space to continue your answers.

1. Last Name(s) (Last, Spelling(s))
   Alnamri

2. First Name(s) (First, Spelling(s))
   Asaad

3. Full Name (in Native Alphabet)
   ًًً ًًً

4. City or Tribe Name (If Any)
   Alnamri

5. Spouse's Full Name of Married

6. Father's Full Name

7. Mother's Full Name

8. Full Name and Address of Contact Person or Organization in the United States (Include Telephone Number)
   William O'Neil
   1718 20th Street NW
   Washington, DC 20009
   Telephone: 202-232-5504

9. List All Countries You Have Visited in the Last Ten Years (Give the Year of Each Visit)
   Turkey, 2008
   Iraq

10. List All Countries That Have Ever Issued You a Passport
    Yes [ ]

11. Have You Ever Lost a Passport or Had One Stolen?
    No [ ]

12. Not Including Current Employer, List Your Last Two Employers
    Name
    Address
    Telephone No
    Job Title
    Supervisor's Name
    Dates of Employment
    Baghdad
    N/A
    Taxi driver
    N/A
    1990-1993

13. List All Professional, Social, and Charitable Organizations to Which You Belong (Member) or Contribute (Contributor) or with Which You Work (Have Worked)
    See attached

14. Do You Have Any Specialized Skills or Training, Including Paramedic, Firefighter, Nuclear, Biomedical, or Chemical Expertise?
    Yes [ ]
    No [ ]

15. Have You Ever Performed Military Service?
    Yes [ ] No [ ]
    If Yes, Give Name of Country, Branch of Service, Rank/Position, Military Specialty, and Dates of Service

16. Have You Ever Been in an Armed Conflict, Either as a Participant or Victim?
    Yes [ ]
    No [ ]

17. List All Educational Institutions You Attend or Have Attended. Include Vocational Institutions But Not Elementary Schools
    Name of Institution
    Address/Telephone No.
    Course of Study
    Dates of Attendance
    No education above elementary school

18. Have You Made Specific Travel Arrangements?
    Yes [ ]
    No [ ]

Paperwork Reduction Act Statement

*The purpose for which this collection of information is estimated to average 3 hours per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You are not required to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to U.S. Department of State, A/FRS/DIR, Washington, DC 20520.

DHS 1977
07-2002
Mandatory Iraq - Specific Supplemental Visa Form

In order to ensure prompt processing of your visa application, please be as detailed as possible in completing the Supplemental Nonimmigrant Visa Application (DS-157) in order to prevent delays in processing your application. Please do not leave any questions blank. If a question does not apply to you, indicate "N/A." Do not answer questions "N/A" if the appropriate responses are "None" or "No." Some questions are composite and require responses to each component of the question.

Question 3: Please write your name in Arabic here.

Question 12: Please list all of your employers since you completed your studies and provide the dates for this employment and your job title for each job.

<table>
<thead>
<tr>
<th>NAME OF EMPLOYER/COMPANY/LOCATION</th>
<th>YOUR JOB TITLE</th>
<th>DATES Employed FROM - TO</th>
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<tr>
<td>Self-employed</td>
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<td>1993-present</td>
</tr>
<tr>
<td>Self-employed</td>
<td>taxi driver</td>
<td>1990-1993</td>
</tr>
</tbody>
</table>

Question 13: The Ba'ath Party is considered a professional organization. If you were ever a member of the Ba'ath Party, please indicate it in response to this question. If you were a member, please explain when and why you joined, and the highest Party level you achieved. If not, please explain how you avoided Party membership.

I was not a Ba'ath Party member because no one forced me to affiliate.

Question 15: If you are a male and have not performed military service, please explain how you avoided mandatory military service in Iraq.

N/A - served in Iraqi military

Updated on 12/17/2007
Baher Azmy

From: Koegel, William <WKoegel@steptoe.com>
Sent: Friday, December 21, 2012 11:04 AM
To: sburke@burkepllc.com; Baher Azmy
Cc: ssajadi@burkepllc.com; O'Connor, John
Subject: FW: Plaintiffs' Depositions

Baher: The Plaintiffs do not get to decide that they’re going to appear, if they appear at all, only at some indeterminate time close to the end of discovery. Given the issuance of the Court of Appeals’ decision in May 2012, and our subsequent discussions with Susan, the Plaintiffs cannot reasonably or credibly claim that they need another three or four months to appear for depositions in the E.D. Va. – which is the location we have always specified and where Susan acknowledged they would appear. Your refusal to provide any information about the Plaintiffs’ efforts to obtain visas means that they’ve been either dilatory or unsuccessful. Neither explanation is satisfactory. We’ll proceed with appropriate action so that the Court can address the matter.

William Koegel
Partner
WKoegel@steptoe.com

Steptoe

+1 202 429 6408 direct  Steptoe & Johnson LLP
+1 202 441 6100 mobile  1330 Connecticut Avenue, NW
+1 202 261 0583 fax  Washington, DC 20036
www.steptoe.com

From: Baher Azmy [mailto:BAzmy@ccrjustice.org]
Sent: Thursday, December 20, 2012 10:54 PM
To: Koegel, William; sburke@burkepllc.com
Cc: ssajadi@burkepllc.com; O'Connor, John
Subject: RE: Plaintiffs' Depositions

Bill,

I am traveling this week but reviewed your message.

In short, we regard your demand that counsel provide an accounting of our efforts to obtain visas as wholly inappropriate. We also take strong exception to your apparent suggestion that the 8 years delay in proceeding to the merits of this case is somehow attributable to Plaintiffs. In any event, we are in the process of obtaining visas for the plaintiffs (the outcome and timing of which, as you know, are not fully within Plaintiffs control), and we fully intend to make them available in E.D.Va for depositions before the conclusion of the discovery period. As I believe Susan informed you, we could also make them available earlier, in Istanbul.
I will be back in the office on December 27, if you wish to speak further about this or other matters.

Thank you,

Baher

From: Koegel, William [WKoegel@steptoe.com]
Sent: Wednesday, December 19, 2012 4:12 PM
To: sburke@burkepllc.com; Baher Azmy
Cc: ssajadi@burkepllc.com; O'Connor, John
Subject: Plaintiffs’ Depositions

Susan/Baher:

We were surprised, and quite concerned, to learn that the Plaintiffs claim that they cannot appear for depositions in the E.D. Va. until March - or later. Susan had previously advised that not only was she certain that the Plaintiffs could enter this country for their depositions, but that she had taken steps to facilitate that. After more than eight (8) years of litigation (including the time the Plaintiffs claim they were members of the putative class in Saleh), they cannot reasonably assert they need at least another three months before appearing for depositions. They cannot avail themselves of the E.D. Va. forum while simultaneously refusing to appear timely for depositions.

Please let us know, specifically and in detail, exactly what Plaintiffs and their counsel have done for Plaintiffs to be able to appear in this country in this action and when each action was taken. We need that information, at a minimum, to determine how to proceed. We would appreciate receiving that information by week’s end.

William Koegel
Partner
WKoegel@steptoe.com

Steptoe

+1 202 429 6408 direct Steptoe & Johnson LLP
+1 202 441 6100 mobile 1330 Connecticut Avenue, NW
+1 202 261 0583 fax Washington, DC 20036
www.steptoe.com
EXHIBIT 3
**Online Nonimmigrant Visa Application (DS-160)**

**Confirmation**

<table>
<thead>
<tr>
<th>ا.الاسم الصحيحة:</th>
<th>NSAIF, SALAH HASSAN</th>
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<td>تاريخ الميلاد:</td>
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<td>ميلاد الميلاد:</td>
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<td>الجنس:</td>
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<td>الجنسية:</td>
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<td>رقم جواز السفر:</td>
<td>BUSINESS/PERSONAL</td>
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<td>الغرض من السفر:</td>
<td>(B1/B2)</td>
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<tr>
<td>تاريخ استكمال:</td>
<td>25 DEC 2012</td>
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<tr>
<td>رقم التأكيد:</td>
<td>AA002T5NWP</td>
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**الموقع الذي تم اختياره:**

| DOH |
| U. S. Embassy Doha |
| P. O. Box 2399 |
| Doha, Qatar |

**Version 01.02.00**

**هذا ليست تأشيرة**

**يجب عليك احضار جواز السفر**

**يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبك للتأشيرة**

https://ceac.state.gov/GENNIV/general/esign/complete_done.aspx?node=Done
Instructions

Please read and follow the instructions carefully. You must complete and file these forms and submit them electronically. You can complete these forms in English or Arabic.

Visa Information

- The Embassy of the United States in [Country] has received your official request.
- Your request will be reviewed by a consular officer.
- You may be subject to additional security checks or interviews in person.
- You can track your visa application status online.

To avoid delays, please ensure that your application is complete and accurate.

Thank you for your cooperation.
December 27, 2012

VIA E-MAIL
Embassy of the United States of America Doha
Consular Section
22nd February Street
Al Luqta District
P.O. Box 2399
Doha, Qatar
nivconsulardoha@state.gov

Re: Non-immigrant Visa for Salah Hassan Nsaif (Application No. AA002T5NWP) to Appear as a Witness in Al Shimari v. CACI International, Inc. Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Nsaif (Application No. AA002T5NWP) and to respectfully request the expedited processing of this application by your office. Mr. Nsaif is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled Al Shimari v. CACI International, Inc. Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Nsaif was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs' Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

The case is now proceeding with discovery. A copy of the court’s discovery order is attached hereto as Exhibit C.

Mr. Nsaif is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Nsaif to the United States on two occasions: First, Mr. Nsaif has been requested to appear for deposition in January 2013. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Nsaif fails to appear, there may be serious consequences, up to and including dismissal of his claims. We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of

Mr. Nsaif, who has family and employment in Qatar, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in Al-Shimari v. CACI

Mohammed Alomari
Attorney and Counselor at Law

Enclosures
EXHIBIT 5
Online Nonimmigrant Visa Application (DS-160)

### Confirmation

This is your confirmation for the nonimmigrant visa application. You are required to present this document along with the travel document to the consular officer at the U.S. embassy or consulate.

**Information:**

- **Full Name:** SHAMMARI, SUHAIL NAJM ABDULLAH
- **Date of Birth:** 1959
- **Place of Birth:** BAGHDAD, IRAQ
- **Gender:** Male
- **Nationality:** IRAQ
- **Travel Document:** BUSINESS/PERSOAL (B1/B2)
- **Application Date:** 31 DEC 2012
- **Confirmation Number:** AA002TFJXF

**Address:**

- BGH
- U.S. Embassy Baghdad
- Al Kindi Street
- International Zone
- Baghdad, Iraq

**Version:** 01.02.00
يرجى ملاحظة أن سوف تكون هناك حاجة لتقدم دليل على أن لديك دفع رسوم طلب التأشيرة وأي رسوم أخرى مربعة مع التطبيق الخاص بك. قد يكون هناك عبء غيره من الرسوم المرتبطة طلب التأشيرة. يرجى مراجعة الخاص بالبلد جدول المعاملة بالمل. لرسوم يمكن مطالبات بتسديدها إذا كان لديك أسلطة إضافية، أو للإطلاع حول كيفية الإتصال بالعملية. توجه المذهب إلى
http://arabic.iraq.usembassy.gov/non_immigrant_visas.html أو
http://travel.state.gov.

ملحوظة: الصورة التي قمت مع طلب التأشيرة لا تتطلب مع معايير الجواهر المحددة في تعليمات الصورة لدائم طلبات التأشيرات. الرجاء أخذ صور جديدة، وأثناء تتقاطع على وجه التحديد مع التعليمات التالي.
http://travel.state.gov.

أ. عند تقييم طلب التأشيرة بك عن طريق توفر التفويض البيولوجي، أي البحوث الخاصة بك، أما مسؤول فنصالي. من خلال تقديم هذا التفويض البيولوجي، أنت تقرر تطبيق المسئولية. لقد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغيز الهجرة الخاصة بك و أن كافة البيانات الوراثة في طلب تأشيرة غير الهجرة صحيحة وكاملة على حد معرفك ومعتقداتك. وعليك على ذلك، التأكد من أن جميع البيانات في الامتنان الخاصة بك، والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك.

ب. اتصل بالبلد الخاصة بك، على سبيل المثال السفارة الأمريكية، إلى الاستلام التأشيرات الإلكترونية، إلا إذا كنت معين طبقة للقانون، حتى وإن كان شخص آخر قد قام بإستكمال استلامك. تتمحور. لقد وقعت استلامك الإليكتروني في 12:50:06 AM EST, 12/31/2012.

في ذلك لأغراض تنفيذ القانون أو تمديد قانون الهجرة. يمكن استخدام الصور التي تقدمها مع التطبيق الخاص بك للتحقق من العمل لأي غيرها من أغراض القانون في الولايات المتحدة.
Online Nonimmigrant Visa Application (DS-160)

Confirmation

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Address: U.S. Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

Version 01.02.00
Instructions

Case 1:08-cv-00827-GBL-JFA  Document 410-1  Filed 05/06/13  Page 36 of 59 PageID# 6182

If you have any questions, please refer to the non-immigrant visa section of the website:

http://arabic.iraq.usembassy.gov/non_immigrant_visas.html

or

http://travel.state.gov.

Please note: All supporting documents and evidence must be submitted in English or translated into English.

For further information, please contact the U.S. Embassy in Baghdad.


The information you provide is subject to the laws of the United States and other countries. The information you submit is subject to scrutiny and may be used for legal purposes.

For questions regarding the submission of documents, please contact the U.S. Embassy in Baghdad.

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For questions regarding the submission of documents, please contact the U.S. Emba...
Online Nonimmigrant Visa Application (DS-160)

**Confirmation**

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<tr>
<td>Date of Birth</td>
<td>1973</td>
</tr>
<tr>
<td>Place of Birth</td>
<td>BAGHDAD, IRAQ</td>
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<td>IRAQ</td>
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<td>Location</td>
<td>BGH U.S. Embassy Baghdad Al Kindi Street International Zone Baghdad, Iraq</td>
</tr>
</tbody>
</table>

This is not your visa. You must apply for a visa at a U.S. Embassy or Consulate. You may be required to provide additional documentation to support your application. Please check the status of your application online at usvisa-geographic.state.gov.
If you need to apply for a visa and you have not yet gathered the required documents, you can visit the following website for guidance:

http://travel.state.gov

Instructions:

If you need to apply for a visa and you have not yet gathered the required documents, you can visit the following website for guidance:

http://travel.state.gov
EXHIBIT 6
Thank you for scheduling your appointment for your non-immigrant visa interview. Please appear at the U.S. Embassy in Doha not more than 30 minutes before your scheduled time.

NOTE: The appointed time is not the time you will be interviewed. You should anticipate a wait of two hours from the time you arrive until completion of the interview process.

The nonimmigrant visa application fee must be paid through Commercial Bank of Qatar. Please be sure to bring your yellow Commercial Bank receipt, application confirmation page, passport, and photo to your interview.

We look forward to seeing you at the Consular Section of the U.S. Embassy in Doha.

- Photos must be
- Photos must measure
printed on a white background.

- Colored or patterned backgrounds are unacceptable. Photos must have been taken within the last six months.
- Photos must show the applicant facing straight ahead, looking neither down nor to the side, with the applicant's head centered in the frame and ears exposed.

50 mm. The applicant's head (measured from top of the hair to the bottom of the chin) must measure 25 mm to 35 mm. The applicant's eye level must be 28 mm to 35 mm from the bottom of the photo.

- Photos must be stapled to the application form. The staples cannot touch the applicant's face.
NIV Appointment System - Appointment Confirmation

PLEASE PRINT THIS PAGE FOR YOUR RECORD

Confirmation ID: Tcm56oyBbs

Appointment Date: Wednesday, January 23, 2013

Appointment Time: 7:30:00 AM

Surname: ALNAMRI

Given Names: ASAAD HAMZAH HANFOOSH

Passport Number: [redacted]

Barcode Number: AA002TFNAZ

Telephone Number: 9647902562813

Email Address: malomari@umich.edu

YOU MUST SCHEDULE AN INTERVIEW APPOINTMENT AT:
http://iraq.usembassy.gov/iraq/b_visas.html
NIV Appointment System

United States Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

NIV Appointment System - Appointment Confirmation

(Please print this page for your record)

Confirmation ID: Qit66yoVuv

Appointment Date: Wednesday, January 23, 2013

Appointment Time: 7:30:00 AM

Surname: SHAMMARI

Given Names: SUHAIL NAJM ABDULLAH

Passport Number: [Redacted]

Barcode Number: AA002TFJXF

Telephone Number: 9647904931943

Email Address: malomari@umich.edu

You must schedule an interview appointment at:
http://iraq.usembassy.gov/iraq/b_visas.html
United States Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

NIV Appointment System - Appointment Confirmation

PLEASE PRINT THIS PAGE FOR YOUR RECORD

Confirmation ID: Khm26frZtr

Appointment Date: Wednesday, January 23, 2013

Appointment Time: 7:30:00 AM

Surname: ARRAK

Given Names: TAHA YASEEN

Passport Number: [Redacted]

Barcode Number: AA002TFPTZ

Telephone Number: 9647818549881

Email Address: malomari@umich.edu

YOU MUST SCHEDULE AN INTERVIEW APPOINTMENT AT:
http://iraq.usembassy.gov/iraq/b_visas.html
EXHIBIT 7
January 9, 2013

William Koegel, Jr.
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Bill,


Plaintiffs object to the Notices of Deposition. Plaintiffs are not currently available to appear in Arlington, Virginia on the dates noticed because they cannot guarantee that they will have received their visas to travel to the United States by those dates. As previously discussed, Plaintiffs are making diligent efforts to secure visas to the United States. As of this date, all Plaintiffs are scheduled to complete interviews by U.S. officials at their respective U.S. Embassy by January 24, 2013 – a date too close to the proposed depositions to ensure their availability. We will inform you as soon as we know whether their visas have been granted, and will work to schedule depositions in the Eastern District of Virginia in a time frame reasonably thereafter. As I mentioned to you, all Plaintiffs remain available to appear on relatively short notice for depositions in Erbil, Iraq or Istanbul, Turkey.

Although Plaintiffs have every expectation of submitting to depositions prior to the scheduled end of fact discovery, Plaintiffs would not object to a request to the Court to enlarge the discovery schedule for a reasonable time if Defendants believe that is necessary on account of the scheduling of Plaintiffs’ depositions.

Very truly yours,

/s/ Baher Azmy

Baher Azmy
Legal Director
EXHIBIT 8
February 15, 2013

Sent via E-mail and Federal Express

Michael Posner
Assistant Secretary of State
Bureau of Democracy, Human Rights, and Labor
U.S. Department of State
2201 C Street NW
Washington, DC 20520
PosnerMH@state.gov

Re: Non-immigrant Visas for Taha Yaseen Arrak (Application No. CEACAA002TFPTZ), Asaad Hamzah Hanfoosh Alnami (Application No. CEACAA002TFNAZ), and Suhail Najm Abdullah Shammari (Application No. CEACAA002TFJXF) to Appear as Witnesses in Al Shimari v. CACI Int’l, Inc., Civil Action No. 08-cv-0827

Dear Assistant Secretary Posner:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to applicant Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnami (Asa’ad Hamza Hanfoosh Al-Zuba’e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari) in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture and abuse against a private military contractor, CACI International, Inc. I write to respectfully – and urgently – request the expedited processing of the visa application of Mr. Arrak (Application No. CEACAA002TFPTZ), Mr. Alnami (Application No. CEACAA002TFNAZ), and Mr. Shammari (Application No. CEACAA002TFJXF) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee.¹ The Court issued an order yesterday, February 14, 2013, compelling the appearance of the plaintiffs at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia within the next 30 days. (A copy of the court order is attached as Exhibit A, and Plaintiffs’ Second Amended Complaint is attached as Exhibit B.).

Mr. Arrak, Mr. Alnami, and Mr. Shammari filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, and were interviewed on or about January 23, 2013. (Copies of each plaintiff’s visa applications, confirmations of receipt of their applications, CCR’s letters of support, and notices of their interview appointments are attached as Exhibits C, D, and E, respectively.) All three plaintiffs have family and employment in Iraq and have every intention of returning to their home country following the conclusion of legal proceedings in this case. CCR and its

¹ The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), residing in Doha, Qatar, recently had his visa application approved by the United States Embassy in Doha, Qatar.
co-counsel will provide all necessary financial support while they are in the U.S. and for their return to Iraq.

We stress that the United States government has supported the position of the plaintiffs in this case in urging that their claims should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, Al-Shimari v. CACI Int’l, Inc., No. 09-13335 (4th Cir. Jan. 14, 2012). We respectfully reiterate the exigency of our request – and the importance of this litigation – and ask your office to give it urgent attention.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@CCRjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in Al-Shimari v. CACI

Mohammed Alomari
Attorney and Counselor at Law

Enclosures
After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number. Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is $1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.
EXHIBIT 9
Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type
NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location
IRAQ, BAGHDAD

Application ID or Case Number
{AA0021FJXF}
(e.g., AA0020AKAX or 20121103450001)

Submit

U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: AA0021FJXF
Case Creation Date: 20-Jan-2013
Status Updated Date: 24-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit U.S. Embassy Baghdad.

Close
Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type
NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location
IRAG, BAGHDAD

Application ID or Case Number
AA00ZTPPTZ
(e.g., AA0020AKAX or 2012110 3456001)

Submit

U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: AA00ZTPPTZ
Case Creation Date: 23-Jan-2013
Status Updated Date: 25-Feb-2013

Your visa is in final processing. If you have not received it in more than 30 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit U.S. Embassy Baghdad.

Close
Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type
NONIMMIGRANT VISA (IV)

Please select a location and enter your Application ID or Case Number

Select a location
IRAQ, BAGHDAD

Application ID or Case Number
A002TFNAZ
(e.g., A00029AKAX or 201110 045 0001)

Submit

U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: A0002TFNAZ
Case Creation Date: 23-Jan-2013
Status Updated Date: 24-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit U.S. Embassy Baghdad.

Close
EXHIBIT 10
EXHIBIT 11
From: Shereef Akeel [mailto:shereef@akeelvalentine.com]
Sent: Thursday, March 14, 2013 11:31 AM
To: Jarvie, Keith; Ball, Robert (DTW)
Subject: Letters Each Iraqi Client will have on their person for the Abu Gharib Case at O'hare Airport this Friday (March 15, 2013)

 Importance: High

Keith – please see the attached letters. Each client will have a letter on their person to be able to show to the border control folks. I will be there outside waiting for them in Chicago. As you know, they don’t speak English but will be advised to show the attached.

As we discussed, if you can please just provide a heads up to the folks in Chicago. We just want to make this border encounter as least traumatic as possible. This is their first time to the United States and as you know they suffered a lot, and now they are embarking on a historic case that hopefully will reflect the essence of democracy to the Iraqi people on being able to seek accountability.

Thank you for your assistance. We really appreciate it.

Ps. See Bob there is some use for our Bridges meetings, which I will make it a point to bring up in our next meeting.

Shereef Akeel
Akeel & Valentine, PLC
Ste 910
888 West Big Beaver
Troy, MI 48094
(248) 269-9595 - Phone
(248) 269-9119 – Fax
Shereef@akeelvalentine.com
EXHIBIT 12
March 13, 2013

Transportation Security Administration
O’Hare International Airport
10000 West O’Hare Avenue
Chicago, IL 60666

Re: Explanation of Travel of Mr. Suhail Najm Abdullah Shammari

Dear Sir/Madam:

Please be advised that we are attorneys for Suhail Najm Abdullah Shammari who is in possession of this letter. The purpose of this letter is to serve as communication between Mr. Shammari and airport staff as Mr. Shammari is not fluent in English.

Mr. Shammari is from Iraq, and has a legal case currently pending in Alexandria, Virginia at the United States District Court, Eastern District of Virginia. Mr. Shammari is one of four Plaintiffs in this case (Case No. 08-cv-0827 GBL-JFA).

Mr. Shammari has been granted a Visa by the United States and is scheduled to testify next week in Washington, D.C., pursuant to an Order issued by the Honorable Judge Gerald Lee of the United States District Court, Eastern District of Virginia.

We have made arrangements for Mr. Shammari’s flight where we plan to meet him at the Chicago O’Hare International Airport. Mr. Shammari’s plane is set to arrive on March 15, 2013, at approximately 6:50 p.m. by Turkish Airlines (FL# TK5). I will be providing accommodations for him during his stay in the U.S. He will be returning to Iraq on Sunday, March 24, 2013, at approximately 11 p.m.

If you have any further questions, please feel free to contact me on my cell number at 248-408-3660, as I will be at the airport waiting to meet Mr. Shammari.

Very truly yours,

Shereef H. Akeel

SHA/cap
Z:\A_B\Abu-Ghuraib Detainees\Al-Shimiri Virginia Case\Correspondence\O’Hare TSA Letter - Shammari.doc
March 13, 2013

Transportation Security Administration  
O’Hare International Airport  
10000 West O’Hare Avenue  
Chicago, IL 60666

Re: Explanation of Travel of Mr. Asaad Hamzah Hanfoosh Alnamri

Dear Sir/Madam:

Please be advised that we are attorneys for Asaad Hamzah Hanfoosh Alnamri who is in possession of this letter. The purpose of this letter is to serve as communication between Mr. Alnamri and airport staff as Mr. Alnamri is not fluent in English.

Mr. Alnamri is from Iraq, and has a legal case currently pending in Alexandria, Virginia at the United States District Court, Eastern District of Virginia. Mr. Alnamri is one of four Plaintiffs in this case (Case No. 08-cv-0827 GBL-JFA).

Mr. has been granted a Visa by the United States and is scheduled to testify next week in Washington, D.C., pursuant to an Order issued by the Honorable Judge Gerald Lee of the United States District Court, Eastern District of Virginia.

We have made arrangements for Mr. Alnamri’s flight where we plan to meet him at the Chicago O’Hare International Airport. Mr. Alnamri’s plane is set to arrive on March 15, 2013, at approximately 6:50 p.m. by Turkish Airlines (FL# TK5). I will be providing accommodations for him during his stay in the U.S. He will be returning to Iraq on Sunday, March 24, 2013, at approximately 11 p.m.

If you have any further questions, please feel free to contact me on my cell number at 248-408-3660, as I will be at the airport waiting to meet Mr. Alnamri.

Very truly yours,

Shereef H. Akeel

SHA/cap
March 13, 2013

Transportation Security Administration  
O'Hare International Airport  
10000 West O'Hare Avenue  
Chicago, IL 60666

Re: Explanation of Travel of Mr. Taha Yaseen Arrak

Dear Sir/Madam:

Please be advised that we are attorneys for Taha Yaseen Arrak who is in possession of this letter. The purpose of this letter is to serve as communication between Mr. Arrak and airport staff as Mr. Arrak is not fluent in English.

Mr. Arrak is from Iraq, and has a legal case currently pending in Alexandria, Virginia at the United States District Court, Eastern District of Virginia. Mr. Arrak is one of four Plaintiffs in this case (Case No. 08-cv-0827 GBL-JFA).

Mr. Arrak has been granted a Visa by the United States and is scheduled to testify next week in Washington, D.C., pursuant to an Order issued by the Honorable Judge Gerald Lee of the United States District Court, Eastern District of Virginia.

We have made arrangements for Mr. Arrak's flight where we plan to meet him at the Chicago O'Hare International Airport. Mr. Arrak’s plane is set to arrive on March 15, 2013, at approximately 6:50 p.m. by Turkish Airlines (FL# TK5). I will be providing accommodations for him during his stay in the U.S. He will be returning to Iraq on Sunday, March 24, 2013, at approximately 11 p.m.

If you have any further questions, please feel free to contact me on my cell number at 248-408-3660, as I will be at the airport waiting to meet Mr. Arrak.

Very truly yours,

[Signature]

Shereef H. Akeel

SHA/cap
EXHIBIT 13
Case 1:08-cv-00827-GBL-JFA   Document 410-2   Filed 05/06/13   Page 9 of 42 PageID# 6214
NAME / İSİM
ARRAK TAPA

FROM / NEREDEN
BAGHDAD

TO / NEREYE
ISTANBUL

FLIGHT / UÇUŞ
TK 0803

CLASS / SINIF
Y

DATE / TARİH
15MAR09

TIME / SAAT
09:40

GROUP
A

SEAT / KOLTUK
24C

ET 2352105710435/1

A STAR ALLIANCE MEMBER
NAME / İSİM
SHAMMARI SUHAIL

FROM / NEREDEN
BAGHDAD

TO / NEREYE
ISTANBUL

FLIGHT UÇUŞ
TK 0803

CLASS SINIF
Y

DATE TARIH
15MAR09

TIME SAAT
09:40

GROUP A
0/0

SEAT / KOLTUK
27B

AD/

ET 2352105710437/1

A STAR ALLIANCE MEMBER
** THIS IS A THIRD PARTY BOOKING SEE CIC+29  ***

1. ARRAK/TAHAMR
2. ALNAMRI/ASAADMIR
3. SHAMMARI/SUHAILMR

SW11GMDT3PW/65ML/34111243/BGW/1G/T/IQ 12MAR S4LDE8

1. TK 803 M FR 15MAR BGWIST HK3 0940 1150 Y M01.1E
2. TK 5 M FR 15MAR ISTORD HK3 1340 1850 Y M01.2E
3. TK 6 K SU 24MAR ORDIST HK3 2300 1645*Y M02.1E
4. TK 802 K TU 26MAR ISTBGW HK3 0350 0725 Y M02.2E

TKT-Y12MARBGWHS 2352105710435/36/37

AP FAX-1 SSRDOCSTKHK1 /P/IRQ/2258006/IRQ/10DEC81/M/23FEB14/ARRAK/TAHA
/YASEEN

2.2 SSRDOCSTKHK1 /P/IRQ/2339256/IRQ/01JUL73/M/14FEB14/ALNAMRI/ASSAD/H
AMZAH

3.3 SSRDOCSTKHK1 /P/IRQ/2080226/IRQ/11OCT59/M/14FEB14/SHAMMARI/SUHAIL
/NAJM

4.1 S1 SSRTKNETKHK1 2352105710435C1
5.1 S2 SSRTKNETKHK1 2352105710435C2
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7.1 S4 SSRTKNETKHK1 2352105710435C4

8.2 S1 SSRTKNETKHK1 2352105710436C1
9.2 S2 SSRTKNETKHK1 2352105710436C2
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11.2 S4 SSRTKNETKHK1 2352105710436C4
12.3 S1 SSRTKNETKHK1 2352105710437C1
13.3 S2 SSRTKNETKHK1 2352105710437C2
14.3 S3 SSRTKNETKHK1 2352105710437C3
15.3 S4 SSRTKNETKHK1 2352105710437C4

GEN FAX-OSITK CTCT BGW 9647705845966-AWIRS TRAVELTOURISM LTD-BAGHDAD-
RANA

2. SSRADPI1GHK3 ADV SECURE FLT PSGR DATA FOR ALL PSGRS
3. SSROTHS1G PNR TRANSFERED TO TK PLS FOLLOW UP BY TK
4.1 OSITK TKNO SSROTHS 1G 2352105710435
5.2 SSROTHS1G TKNO2352105710436
6.3 SSROTHS1G TKNO2352105710437
** THIS IS A THIRD PARTY BOOKING SEE CIC*29 **

F 1.1ARRAK/TAHAMR 2.1ALNAMRI/ASAADMR 3.1SHAMMARI/SUHAILMR

SWI1GMDT3PW/65ML/34111243/BGW/1G/T/IQ 12MAR S4LDE8
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2  TK 5 M  FR 15MAR  ISTORD HK3  1340  1850  Y M01.2E
3  TK 6 K  SU 24MAR  ORDIST HK3  2300  1645*Y M02.1E
4  TK 802 K  TU 26MAR  ISTBGW HK3  0350  0725  Y M02.2E

TKT-Y12MARBGWHS 2352105710435/36/37
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/YASEEN
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AMZAH
3.3 SSRDOCSTKHK1 /P/IRQ/2080226/IRQ/11OCT59/M/14FEB14/SHAMMARI/SUHAIL
/NAJM
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7.1 S4 SSRTKNETKHK1 2352105710435C4
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11.2 S4 SSRTKNETKHK1 2352105710436C4
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13.3 S2 SSRTKNETKHK1 2352105710437C2
14.3 S3 SSRTKNETKHK1 2352105710437C3
15.3 S4 SSRTKNETKHK1 2352105710437C4

GEN FAX-OSITK CTCT BGW 9647705845966-AWIRS TRAVELTOURISM LTD-BAGHDAD-
RANA
2.SSRADPI1GHK3 ADV SECURE FLT PSGR DATA FOR ALL PSGRS
3.SSROTH51G PNR TRANSFERED TO TK PLS FOLLOW UP BY TK
4.1 OSITK TKNO SSSROTHS 1G 2352105710435
5.2 SSROTH51G TKNO2352105710436
6.3 SSROTH51G TKNO2352105710437
EXHIBIT 14
Online Nonimmigrant Visa Application (DS-160)

Confirmation

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<td>No</td>
</tr>
<tr>
<td>Full Name</td>
<td>SHAMMARI, SUHAIL NAJM ABDULLAH</td>
</tr>
<tr>
<td>Date of Birth</td>
<td>1959</td>
</tr>
<tr>
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<tr>
<td>Application Date</td>
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<td>Confirmation Number</td>
<td>AA002Z39T5</td>
</tr>
<tr>
<td>Application Submission Date</td>
<td>[date]</td>
</tr>
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This is the confirmation.

You must present this

Passport

You may also present additional documents that show the relationship that supports the purpose of your travel.

U.S. Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

Version 01.02.00

ملحوظة: ما لم تكون معنى من المقابله، سيتم عليك توقيع التطبيق الخاص بك عن طريق توقيع التوقع البريدي، أي اللمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البريدي، خذ نصية طالب السوالة الخاصة بك من خلال تدوين هذا التوقيع البريدي، يمكن أن يعطى نصيحة أو مساعدة سواء على ذلك، ستطلب في وقت المقابله الخاصة بالإقرار تحت عقود شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك التي قد في خلال مقابلة صحيحة وكاملة على أفضل ما في عقلك ومعتقداتك.

13:32 AM EST 3/16/2013

إذا كنت متلبيًا توقيع طلب الكتروني، إلا إذا كنت معنى ملفا للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارة، توقيعك. لقد وقعت إستمارات الكترونية في وقت السيناريات الكلاسيكية من التطبيق، إذا وأنت ضح أوراق، وآلة بخصوص البيانات المعقدة أو مطالعة قد تؤدى إلى الرفض الدائم لإستمارات التأشيرات الخاصة بك أو رفض طلب لدخول الولايات المتحدة. جمع التصريحات المذكورة في هذا التطبيق قد تتعارض للملفية تحت طالب EAEC. ) 28 U.S.C. 1746.

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المعقدة مع الإستمارة الخاصة بك قد تكون ملحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض التنفيذ القانون أو تنفيذ قانون الهجرة. يمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك لتحقيق من العمل أو غيرها من أغراض القانون في الولايات المتحدة.
Online Nonimmigrant Visa Application (DS-160)

**Confirmation**

<table>
<thead>
<tr>
<th>اسم المطلوب:</th>
<th>ARRAK, TAHA YASEEN</th>
</tr>
</thead>
<tbody>
<tr>
<td>محل الميلاد:</td>
<td>BAGHDAD, IRAQ</td>
</tr>
<tr>
<td>الجنس:</td>
<td>Male</td>
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<td>IRAQ</td>
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<td>BUSINESS/PERSOAL (B1/B2)</td>
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<td>تاريخ إستكمال الطلبات:</td>
<td>16 MAR 2013</td>
</tr>
<tr>
<td>رقم التأكيد:</td>
<td>AA002Z3E41</td>
</tr>
</tbody>
</table>

الموقع الذي تم اختياره:

BGH
U.S. Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

تم إعداد هذا المستند في تاريخ 01.02.00

**Note:**

يجب عليك إحضار

جواز السفر

يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبيك للتأشيرة.
يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأي رسوم أخرى مرتبطة بالطلب الخاص بك. قد يكون هناك غيرها من الرسوم المتبعة طلب التأشيرة. يرجى مراجعة الخاص البلاد جدول المعاملة بالملأ لأي رسوم يمكن مطالعتك بتضمينها إذا كان لديك أسلحة إضافية، أو للاستعلام حول كيفية الإتصال بالفصلية، برجاء الدخول إلى 

http://arabic.iraq.usembassy.gov/non_immigrant_visas.html

أو

http://travel.state.gov

ملاحظة: لم تكن معنى من المقابلة، سيتم قبول تفاوض التأشيرة بك عن طريق توفير التوفيق البيولوجي، أي البيومتات الخاصة بك أمام مسؤول فنى. من خلال تقديم هذا التوفيق البيولوجي، إذا تقرر تقديم طلب الموثوقية المطلوبة، أي قبل الإصدار لخبر الجرافي الخاصة بك أو وكالة البيانات المتاح في طلب التأشيرة لخبر الجرافي الخاصة بك، وأن كافة البيانات المتاحة في طلب تأشيرة لخبر الجرافي الخاصة بك، وأن كفاءة البيانات المتاحة في طلب تأشيرة لخبر الجرافي الخاصة بك، وأن كفاءة البيانات المتاحة في طلب تأشيرة لخبر الجرافي الخاصة بك، وأن كفاءة البيانات المتاحة في طلب تأشيرة لخبر الجرافي الخاصة بك.

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون وافية إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون وتنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أعراض القانون في الولايات المتحدة.

http://arabic.iraq.usembassy.gov/non_immigrant_visas.html
http://travel.state.gov
Online Nonimmigrant Visa Application (DS-160)

**Confirmation**

<table>
<thead>
<tr>
<th>Field</th>
<th>Details</th>
</tr>
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<tbody>
<tr>
<td>Name</td>
<td>ALNAMRI, ASAAD HAMZAH HANFOOSH</td>
</tr>
<tr>
<td>Date of Birth</td>
<td>1973</td>
</tr>
<tr>
<td>Gender</td>
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<td>BUSINESS/PERSOAL (B1/B2)</td>
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<tr>
<td>Application Date</td>
<td>16 MAR 2013</td>
</tr>
<tr>
<td>Confirmation Code</td>
<td>AA002Z37HH</td>
</tr>
<tr>
<td>Location</td>
<td>BGH U.S. Embassy Baghdad Al Kindi Street International Zone Baghdad, Iraq</td>
</tr>
</tbody>
</table>

This is an application for a nonimmigrant visa. You need to prepare the following:

- Passport
- Additional documents if requested

You may also need to provide additional identification, which can be found in the application guide.

Version 01.02.00

لمحورة: ما لم تكون معنى من المقابلة، سيتم على توقع التطبيق الخاص بك عن طريق توفير التوفيق البيولوجي، أي البحوث الخاصة بك مسار مسؤول قضائي. من خلال تقديم هذا التوفيق البيولوجي، أنت تتر تحت طاعة المسؤولية للفواتير وتقييم الأسلحة المطلوبة في طلب تأشيرة إغلاق الهجرة الخاصة بك وبناء الأصل الوراثي لإغلاق الهجرة الوراثي وكاملة على حد معرفك ومعتقداتك. وعلاوة على ذلك، تتطلب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الاستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علتك ومعتقداتك.

قد كنت مطالباً بتوقيع طلبك الإلكترونية، إلا إذا كنت معين في طلب القوانين، حتى وإن كان شخص آخر قد قام باستكمال استمانتك. توقيعك. لقد وقعت استمانتك الإلكترونية في 3/16/2013 1:13:32 AM EST.

المنظمات التي قدمت في الاستمارة الخاصة بك وغيرها من المعلومات المتعلقة بالإمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات. بما في ذلك لأغراض تنفيذ القانون وتنفيذ قانون الهجرة. يمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أغراض القانون في الولايات المتحدة.

لا يوجد نص يمكن قراءته بشكل طبيعي من الصورة المرفقة.

Case 1:08-cv-00827-GBL-JFA   Document 410-2   Filed 05/06/13   Page 20 of 42 PageID# 6225
EXHIBIT 15
SECOND AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION OF CACI PREMIER TECHNOLOGY, INC.

TAKE NOTICE that Plaintiffs will take the deposition of Defendant CACI Premier Technology, Inc. ("CACI PT") beginning on April 16, 2013 at 9:30 a.m. and continuing thereafter until complete, at the offices of Zwerling, Moseley & Spears, P.C., 114 North Alfred Street, Alexandria, VA 22314, before a Notary Public or other officer duly authorized to administer oaths, to be recorded by stenographic means and by videotape.

NOTICE IS HEREBY GIVEN that pursuant to Fed. R. Civ. P. 30(b)(6), CACI PT is required to designate one or more appropriate persons to testify on its behalf with respect to each of the matters set forth in Schedule A attached hereto, and the person(s) so designated shall be required to testify as to each of those matters known or reasonably available to the corporation.
Dated: Bethesda, Maryland
April 5, 2013

/s/ George Brent Mickum
George Brent Mickum IV (VA Bar # 24385)
Law Firm of George Brent Mickum IV
5800 Wiltshire Drive
Bethesda, MD 20816
Telephone: (202) 281-8662
gbmickum@gmail.com

Baher Azmy
Katherine Gallagher
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012

Robert P. LoBue
PATTERSON BELKnap WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036

Shereef Hadi Akeel
AKEEL & VALENTINE, P.C.
888 West Big Beaver Road
Troy, Michigan 48084-4736

Attorneys for Plaintiffs
SCHEDULE A

DEFINITIONS

1. “Abu Ghraib” means the Abu Ghraib prison complex in or near Baghdad, Iraq.

2. “Army Field Manual” means the United States Army Field Manual on Interrogation, also known as FM 34-52, including any amendments or editions thereof, and/or Army Field Manual 2 22.3, or FM 2-22.3, Human Intelligence Collector Operations, including any amendments or editions thereof.

3. “CACI International” means CACI International, Inc. and any of its predecessors, affiliates, subsidiaries (including but not limited to CACI Premier Technology, Inc.), divisions, business units, partners, principals, directors, officers, employees, attorneys, accountants, agents, consultants, independent contractors, assigns, and any person or entity purporting to act on its behalf.

4. “CACI PT” means CACI Premier Technology, Inc.


6. “Geneva Conventions” means the Geneva Convention relative to the Treatment of Prisoners of War (12 August 1949), also known as the Third Geneva Convention, and the Geneva Convention relative to the Protection of Civilian Persons in Time of War (12 August 1949), also known as the Fourth Geneva Convention, including any and all protocols and/or amendments thereto.

8. "Services" means any conduct engaged in by any and all CACI International or CACI PT employees or agents of any sort whatsoever for which CACI International or CACI PT was paid, sought to be paid, or had a reasonable expectation that CACI International or CACI PT would be paid or would seek to be paid, by the United States. Conduct is not outside the scope of the definition of Services merely because CACI International or CACI PT ultimately decided not to bill the United States for the conduct and/or the United States ultimately decided not to pay CACI International or CACI PT for the conduct.

9. "United States" means any and all Executive Branch and Congressional Branch governmental entities of any sort, including but not limited to, the House of Representatives, the Senate, any committee or subcommittee of the House or the Senate, individual members of the House or Senate, the United States Army, Navy, Air Force, Marines, the Department of Defense, the Department of the Interior, the Department of Justice, and any and all other governmental agencies; and any and all persons employed by any such Executive or Congressional Branch entities. The term "United States" excludes the Judicial Branch and private contractors such as CACI International or CACI PT retained by the United States government to provide Services.
TOPICS FOR EXAMINATION

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, CACI PT is directed to produce a representative or representatives to testify regarding the following matters:

Rule 30(b)(6) Categories

1. All steps taken to preserve records relating to CACI PT’s provision of services to the United States in Iraq.

2. All steps taken to respond to the United States’ investigations or inquiries (whether formal or informal) relating to CACI PT’s provision of services to the United States in Iraq.

3. All steps taken to inform the Board of Directors of CACI International or CACI PT about the United States’ investigations or inquiries (whether formal or informal) relating to CACI PT’s provision of services in Iraq.

4. Internal investigations by CACI International or CACI PT relating to CACI PT’s provision of services in Iraq.

5. CACI International’s or CACI PT’s public relations strategy to address the allegations of detainee abuse in connection with CACI PT’s provision of services to the United States in Iraq.

6. CACI PT’s policies and practices for recruiting, hiring, training, and supervising employees in connection with CACI PT’s provision of services to the United States in Iraq.

7. All instruction and training provided to CACI PT employees providing services at Abu Ghraib regarding the requirements of the Geneva Conventions, Department of Defense Directive, the Army Field Manual, or U.S. Army Regulation 190-8, relating to the treatment of prisoners.

8. All compensation received by CACI PT in connection with CACI’s provision of services to the United States in Iraq.
9. CACI PT's management and organizational structure.

10. The involvement of employees, officers or directors of CACI International in any aspect of CACI PT's provision of services to the United States in Iraq.

11. All information known to CACI PT about the four named plaintiffs.

12. All information known to CACI PT about torture or other abuse of detainees at Abu Ghraib.

13. The recruitment and employment by CACI International or CACI PT of: Claudius Albury, Adrian Allen, Jose Almanzar, Richard Arant, John Arellano, William Armstrong, Mikhail Bagdassaroy, Jose Bartolomei, Mark Billings, Peter Bilon, Henry Black, John Blee, Kevin Lee Bloodworth, Michael Cahoon, Christine Chaney, Armando Chapa, Dion Cox, Jose Cruz, Stephen Dedeaux, Timothy Dugan, Sean Duysen, Michele Engstrom, Eric Fair, Michael Farrell, Stephen Furbush, Tyrone Gardner, Meyer Gilbert, Skyler Greco, Brian Greene, Charles Hattabaugh, John Hedrick, Michael Henson, Dennis Hirth, Brett Holder, Tom Howard, Donald Hyde, Ferdinand Ibabao, Lisa Isaacs, Berryl Jackson, Daniel Johnson, John Thomas Johnson, James Matheson, James Mayo, Jeff McCall, William McNulty, Martin Meadows, Elliot Miller, Amy Monahan, Harold Mong, Jeffery Mouton, Chuck Mudd, Guil Mullen, Sean Nelson, Torin Nelson, Scott Norman, Scott Northrop, Steven Pescatore, Daniel Porvaznik, Kenneth Powell, Hugh Brent Prestley, Todd Preston, Miguel Rivera, Joseph Ryan, James Schaffer, Donald Simpson, Robert Smith Jr., Wayne Smith, Steven Stefanowicz, Eddie Thomas, Harry Thornsvard, Michael Tutor, Alexander Valle, Ervisto Villela Sr., Ronald Warner, Marcus Warren, Allen West, Antoine Williams, and Dani Zeinoun (the "Employees"), including without limitation the identity and employer of the persons who recruited, trained and supervised the Employees, and the specific corporate entity that paid the costs of recruitment and salary or other compensation of each Employee.
14. The reporting structure(s) within CACI PT related to any aspect of CACI PT's provision of services to the United States in Iraq.

15. Any insurance policies covering CACI PT that may be applicable to the claims in this action.

16. Solicitation and negotiation by or on behalf of CACI PT of service contracts with the United States for any Services to be performed in Iraq.

17. Any information relating to the denial of permission for plaintiffs Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, and Asa'ad Hamza Hanfoosh Al-Zuba'e to board a flight to the United States or otherwise enter the United States, including CACI PT's knowledge of the involvement of the Department of Homeland Security or any other U.S. Government agency in such action or regarding any of these plaintiffs' names being on any list or in any database maintained by the U.S. Government.
SECOND AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION OF
CACI INTERNATIONAL, INC.

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Dated: Bethesda, Maryland
April 5, 2013

/s/ George Brent Mickum
George Brent Mickum IV (VA Bar # 24385)
Law Firm of George Brent Mickum IV
5800 Wiltshire Drive
Bethesda, MD 20816
Telephone: (202) 281-8662
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3. All steps taken to inform the Board of Directors of CACI International about the United States’ investigations or inquiries (whether formal or informal) relating to CACI PT’s provision of services in Iraq.

4. Internal investigations by CACI International relating to CACI PT’s provision of services in Iraq.

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8. All compensation received by CACI International or CACI PT in connection with CACI PT’s provision of services to the United States in Iraq.

9. CACI International’s and CACI PT’s management and organizational structures.

10. The involvement of employees, officers or directors of CACI International in any aspect of CACI PT’s provision of services to the United States in Iraq.

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employer of the persons who recruited, trained and supervised the Employees, and the specific corporate entity that paid the costs of recruitment and salary or other compensation of each Employee.

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EXHIBIT 16
April 15, 2013

By Hand

Office of the General Counsel
United States Department of Homeland Security
Washington, DC 20258

Re: Al Shimari et al. v. CACI Int'l, No. 08-0827 (E.D. Va.)—Subpoena Duces Tecum

Dear Sir or Madam:

Please find enclosed a subpoena in connection with the above-referenced action, in which we represent the plaintiffs. Please accept the subpoena, in conjunction with this letter, as our request pursuant to United States ex rel. Touhy v. Ragen, 340 U.S. 462 (1951), and the relevant regulations.

On March 15, 2013, three plaintiffs we represent in the above-referenced action—Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, Asa'ad Hamza Hanfoosh Al-Zuba'e—were prevented from boarding an airplane in Baghdad, Iraq to travel to the United States for depositions, despite having received visas to enter the United States in February 2013. The plaintiffs had purchased tickets and received boarding passes to travel from Baghdad to Chicago O'Hare International Airport, via Istanbul, Turkey. However, after arriving at the airport in Baghdad and proceeding to their departure gate, the plaintiffs were prevented from boarding their flight to Istanbul for unknown reasons.

At a hearing held on Friday, April 12, 2013, the Court in the above-referenced action directed plaintiffs’ counsel to determine why the plaintiffs were prevented from boarding their flight on March 15 and what steps must be taken to facilitate the plaintiffs’ future travel to the United States. The information requested in the attached subpoena is directly relevant to the Court’s request and to the plaintiffs’ ability to pursue their litigation.

You must respond to this subpoena by producing responsive documents on or before April 22, 2013 at the Law Firm of George Brent Mickum IV, 5800 Wiltshire Drive, Bethesda, MD 20816. Alternatively, you may mail the documents to the attention of Sarah Lorr at Patterson Belknap Webb & Tyler LLP, 1133 Avenue of the Americas, New York, NY 10036.
April 15, 2013
Page 2

If you have any questions, please contact me by phone at (212) 336-2474 or by email at slorr@pbwt.com.

Sincerely yours,

Sarah Lorr

Enclosure

cc:  Scott Levin, Esq.
     Eric Soskin, Esq.
     Baher Azmy, Esq.
     Robert P. LoBue, Esq.
     George Brent Mickum IV, Esq.
     Shereef Hadi Akeel, Esq.
     William Koegel, Esq.
     John O’Connor, Esq.
UNITED STATES DISTRICT COURT
for the
District of Maryland

Suhail Najim Abdullah Al Shimari, et al.,
v.
CACI Premier Technology, Inc.

Civil Action No. 08-Civ-0827
(Pending in the Eastern District of Virginia)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Office of the General Counsel
United States Department of Homeland Security
Washington, DC 20258

X Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the
following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or
sampling of the material:

See attached Schedule A

<table>
<thead>
<tr>
<th>Place:</th>
<th>Date and Time</th>
</tr>
</thead>
</table>
| George Brent Mickum IV
Law Firm of George Brent Mickum IV
5800 Wiltshire Drive
Bethesda, Maryland 20816 | April 22, 2013
10:00 a.m. |

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or
other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting
party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation
on it.

<table>
<thead>
<tr>
<th>Place:</th>
<th>Date and Time:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and
Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing
so, are attached.

Date: April 15, 2013

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR

Robert P. LoBue/SHL

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing Suhail Najim Abdullah Al Shimari,
et al., who issues or requests this subpoena, is: Robert P. LoBue, Patterson Belknap Webb & Tyler LLP,
rplobue@pbwt.com, (212) 336-2000 (phone), (212) 336-2222 (fax)
PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for (name of individual and title, if any) ____________________________
was received by me on (date) ____________________.

☐ I personally served the subpoena on the individual at (place) ____________________________
________________________________________________________ on (date) ____________________ ; or

☐ I left the subpoena at the individual’s residence or usual place of abode with (name) ________________
________________________________________________________, a person of suitable age and discretion who resides there,
on (date) ____________________, and mailed a copy to the individual’s last known address; or

☐ I served the subpoena on (name of individual) ____________________________ , who is
designated by law to accept service of process on behalf of (name of organization) ____________________________
________________________________________________________ on (date) ____________________ ; or

☐ I returned the subpoena unexecuted because ___________________________________________; or

☐ Other (specify):

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
rendered to the witness fees for one day’s attendance, and the mileage allowed by law, in the amount of
$ ____________________ .

My fees are $ ______________ for travel and $ ______________ for services, for a total of $ ________________ .

I declare under penalty of perjury that this information is true.

Date: ____________________ ____________________

Server's signature

Printed name and title

Server's address
Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
(i) expressly make the claim; and
(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty’s failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).
SCHEDULE A

Documents Requested


2. Documents sufficient to show whether, as of March 15, 2013, Plaintiffs were on a “No Fly List” or any other government security list inclusion on which may prevent Plaintiffs from flying into and/or the United States and, if so, on which date each of the Plaintiffs was added to any such list, the name of the list, and the agency responsible for the list.

3. Documents sufficient to show whether Plaintiffs are currently on a “No Fly List” or any other government security list inclusion on which may prevent Plaintiffs from flying into the United States and, if so, on which date each of the Plaintiffs was added to any such list, the name of the list, and the agency responsible for the list.

4. Any documents, records, or communications concerning, relating to, relied upon in connection with, or showing any of the reasons for, the inclusion of Plaintiffs on any “No Fly List” or any other government security list inclusion on which may prevent Plaintiffs from flying into the United States.

5. All communications between April 1, 2012 and the present between the Department of Homeland Security employees and any employees or agents or attorneys of CACI International, Inc., CACI Premier Technology, Inc., or any affiliates or subsidiaries thereof relating to Plaintiffs, including communications relating to Plaintiffs’ plans or ability to travel to the United States and/or the inclusion of Plaintiffs on a “No Fly List” or any other government security list inclusion on which may prevent Plaintiffs from flying into the United States.
EXHIBIT 17
April 16, 2013

Sent via e-mail (DeBartoloDM@state.gov) and federal express

David M. DeBartolo
Attorney-Adviser
Office of the Legal Adviser, African and Near Eastern Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520


Dear Mr. DeBartolo:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa’ad Hamza Hanfoosh Al-Zuba’e), and Suhail Najm Abdullah Shammar (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

I write to respectfully – and urgently – request the expedited processing of the renewed visa applications granting entry to the United States of Mr. Arrak (Application No. AA002Z3E41), Mr. Alnamri (Application No. AA002Z37HH), and Mr. Shammar (Application No. AA002Z39T5) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee. As set forth below, these three men had been granted visas to enter the United States in February 2013, and while it is my understanding that those visas remain valid, I seek your assistance in having these renewed applications granted and assurances that Messrs. Arrak, Alnamri and Shammar will be given clearance to board a flight to the United States and granted entry into the United States, as each is under court order compelling their appearance at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia by April 26, 2013.

Mr. Arrak, Mr. Alnamri, and Mr. Shammar first filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, were interviewed on or about January 23, 2013, the fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

The Court first issued an Order compelling the appearance of the plaintiffs on February 14, 2013, and has subsequently issued three extensions, with the last extension requiring plaintiffs to appear before April 26, 2013, which is the last day of discovery in this case. See Exhibit A.

1 The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

2 The Court first issued an Order compelling the appearance of the plaintiffs on February 14, 2013, and has subsequently issued three extensions, with the last extension requiring plaintiffs to appear before April 26, 2013, which is the last day of discovery in this case. See Exhibit A.
2013, and had their visa applications granted on February 23 and 24, 2013.\(^3\) (Copies of CCR’s letters of support and the visa confirmations are attached as Exhibits B and C, respectively.)

Messrs. Arrak, Alnamri, and Shammari were scheduled to appear in Washington, D.C. for their depositions during the week of March 18, 2013. (See Exhibit D, April 10, 2013 Declaration of Baher Azmy setting out the details on plaintiffs efforts to travel to the United States). Round-trip tickets were purchased, departing Baghdad for Chicago via Istanbul on March 15, 2013 and returning from Washington, D.C. to Baghdad on March 24, 2013. After checking in and being issued their boarding passes in Istanbul, they were taken off the line to board the plane and told that the officials at the airport had received a call from the United States directing them to not allow the Baghdad Plaintiffs to board the plane and that the Baghdad Plaintiffs would have to resolve the problem in the United States.

Since March 15, 2013, I, and the three plaintiffs, have been working to resolve whatever issue impeded their travel to the United States. Immediately after the denial of boarding, I communicated with Kelly Landry from your office, and was advised that Messrs. Arrak, Alnamri and Shammari should re-apply for visas to allow an inter-agency miscommunication to be resolved. The three men reapplied for visas on March 16, 2013 and appeared for interviews at the U.S. Embassy in Baghdad again on March 17, 2013. On March 29, 2013, we provided the Department of State with an itinerary for travel from Baghdad to the Washington, D.C. on Delta Airlines, arriving on April 19, 2013 and departing the U.S. on April 27, 2013. As of today, those visa applications are still pending and we seek your assistance in expediting their review, so that the plaintiffs can travel to the United States for their deposition next week.

We stress that the United States government has supported the position of the plaintiffs in this case in urging that their claims should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, Al-Shimari v. CACI Int’l, Inc., No. 09-13335 (4th Cir. Jan. 14, 2012). We respectfully reiterate the exigency of our request – and the importance of this litigation – and ask your office to give it urgent attention.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

\(^3\) The first visa applications were processed with the following application numbers: Mr. Arrak (AA002TFPTZ), Mr. Alnamri (AA002TFNAZ), and Mr. Shammari (AA002TFJXF).
Theodore Lienhart  
Supervisory Post Management Officer: Iraq  
Bureau of Near East Affairs  
U.S. Department of State  
2201 C Street NW  
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammary to Appear for Litigation:  
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827  

Dear Mr. Lienhart:  

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa’ad Hamza Hanfoosh Al-Zuba’e), and Suhail Najm Abdullah Shammary (Suhail Najim Abdullah Al Shammary), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc., a wholly owned subsidiary of CACI International, Inc.

I write to respectfully – and urgently – request the expedited processing of the renewed visa applications granting entry to the United States of Mr. Arrak (Application No. AA002Z3E41), Mr. Alnamri (Application No. AA002Z37HH), and Mr. Shammary (Application No. AA002Z39T5) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee. As set forth below, these three men had been granted visas to enter the United States in February 2013, and while it is my understanding that those visas remain valid, I seek your assistance in having these renewed applications granted and assurances that Messrs. Arrak, Alnamri and Shammary will be given clearance to board a flight to the United States and granted entry into the United States, as each is under court order compelling their appearance at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia by April 26, 2013.

Mr. Arrak, Mr. Alnamri, and Mr. Shammary first filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, were interviewed on or about January 23, 2013, and were granted non-immigrant visas valid through February 28, 2013. The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

1 The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

2 The Court first issued an Order compelling the appearance of the plaintiffs on February 14, 2013, and has subsequently issued three extensions, with the last extension requiring plaintiffs to appear before April 26, 2013, which is the last day of discovery in this case. See Exhibit A.
2013, and had their visa applications granted on February 23 and 24, 2013.³ (Copies of CCR’s letters of support and the visa confirmations are attached as Exhibits B and C, respectively.)

Messrs. Arrak, Alnamri, and Shammari were scheduled to appear in Washington, D.C. for their depositions during the week of March 18, 2013. (See Exhibit D, April 10, 2013 Declaration of Baher Azmy setting out the details on plaintiffs efforts to travel to the United States). Round-trip tickets were purchased, departing Baghdad for Chicago via Istanbul on March 15, 2013 and returning from Washington, D.C. to Baghdad on March 24, 2013. After checking in and being issued their boarding passes in Istanbul, they were taken off the line to board the plane and told that the officials at the airport had received a call from the United States directing them to not allow the Baghdad Plaintiffs to board the plane and that the Baghdad Plaintiffs would have to resolve the problem in the United States.

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We stress that the United States government has supported the position of the plaintiffs in this case in urging that their claims should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, Al-Shimari v. CACI Int’l, Inc., No. 09-13335 (4th Cir. Jan. 14, 2012). We respectfully reiterate the exigency of our request – and the importance of this litigation – and ask your office to give it urgent attention.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

[Signature]

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

³ The first visa applications were processed with the following application numbers: Mr. Arrak (AA002TFPTZ), Mr. Alnamri (AA002TFNAZ), and Mr. Shammari (AA002TFJXF).
April 16, 2013

Sent via e-mail (McLeodM@state.gov) and federal express

Mary McLeod  
Acting Legal Adviser  
Office of the Legal Adviser  
U.S. Department of State  
2201 C Street NW  
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammar to Appear for Litigation:  
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Acting Legal Adviser McLeod:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa’ad Hamza Hanfoosh Al-Zuba’e), and Suhail Najm Abdullah Shammar (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

I write to respectfully – and urgently – request the expedited processing of the renewed visa applications granting entry to the United States of Mr. Arrak (Application No. AA002Z3E41), Mr. Alnamri (Application No. AA002Z37HH), and Mr. Shammar (Application No. AA002Z39T5) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee.\(^1\) As set forth below, these three men had been granted visas to enter the United States in February 2013, and while it is my understanding that those visas remain valid, I seek your assistance in having these renewed applications granted and assurances that Messrs. Arrak, Alnamri and Shammar will be given clearance to board a flight to the United States and granted entry into the United States, as each is under court order compelling their appearance at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia by April 26, 2013.\(^2\)

Mr. Arrak, Mr. Alnamri, and Mr. Shammar first filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, were interviewed on or about January 23, 2013, and were granted non-immigrant visas for entry to the United States in February 2013.\(^3\) The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

I seek your assistance in having these renewed applications granted and assurances that Messrs. Arrak, Alnamri and Shammar will be given clearance to board a flight to the United States and granted entry into the United States, as each is under court order compelling their appearance at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia by April 26, 2013.\(^2\)

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1 The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.
2 The Court first issued an Order compelling the appearance of the plaintiffs on February 14, 2013, and has subsequently issued three extensions, with the last extension requiring plaintiffs to appear before April 26, 2013, which is the last day of discovery in this case. See Exhibit A.
2013, and had their visa applications granted on February 23 and 24, 2013.\(^3\) (Copies of CCR’s letters of support and the visa confirmations are attached as Exhibits B and C, respectively.)

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Since March 15, 2013, I, and the three plaintiffs, have been working to resolve whatever issue impeded their travel to the United States. Immediately after the denial of boarding, I communicated with Kelly Landry from your office, and was advised that Messrs. Arrak, Alnamri and Shammari should re-apply for visas to allow an inter-agency miscommunication to be resolved. The three men reapplied for visas on March 16, 2013 and appeared for interviews at the U.S. Embassy in Baghdad again on March 17, 2013. On March 29, 2013, we provided the Department of State with an itinerary for travel from Baghdad to the Washington, D.C. on Delta Airlines, arriving on April 19, 2013 and departing the U.S. on April 27, 2013. As of today, those visa applications are still pending and we seek your assistance in expediting their review, so that the plaintiffs can travel to the United States for their deposition next week.

We stress that the United States government has supported the position of the plaintiffs in this case in urging that their claims should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, Al-Shimari v. CACI Int’l, Inc., No. 09-13335 (4th Cir. Jan. 14, 2012). We respectfully reiterate the exigency of our request – and the importance of this litigation – and ask your office to give it urgent attention.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

\(^3\) The first visa applications were processed with the following application numbers: Mr. Arrak (AA002TFPTZ), Mr. Alnamri (AA002TFNAZ), and Mr. Shammari (AA002TFJXF).
April 16, 2013

Sent via e-mail (RappSJ@state.gov) and federal express

Stephan Rapp
Ambassador-at-Large
Office of Global Criminal Justice
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shamhari to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Ambassador Rapp:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa’ad Hamza Hanfoosh Al-Zuba’e), and Suhail Najm Abdullah Shamhari (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

I write to respectfully – and urgently – request the expedited processing of the renewed visa applications granting entry to the United States of Mr. Arrak (Application No. AA002Z3E41), Mr. Alnamri (Application No. AA002Z37HH), and Mr. Shamhari (Application No. AA002Z39T5) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee. As set forth below, these three men had been granted visas to enter the United States in February 2013, and while it is my understanding that those visas remain valid, I seek your assistance in having these renewed applications granted and assurances that Messrs. Arrak, Alnamri and Shamhari will be given clearance to board a flight to the United States and granted entry into the United States, as each is under court order compelling their appearance at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia by April 26, 2013.

Mr. Arrak, Mr. Alnamri, and Mr. Shamhari first filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, were interviewed on or about January 23, 2013. The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

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If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

\(^3\) The first visa applications were processed with the following application numbers: Mr. Arrak (AA002TFPTZ), Mr. Alnamri (AA002TFNAZ), and Mr. Shammari (AA002TFJXF).
Sent via e-mail (Searss@state.gov) and federal express

Uzra Zeya
Acting Assistant Secretary of State
Bureau of Democracy, Human Rights, and Labor
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammar to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Acting Assistant Secretary Zeya:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa’ad Hamza Hanfoosh Al-Zuba’e), and Suhail Najm Abdullah Shammar (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

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1 The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.
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Enclosures

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EXHIBIT A
IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SUHAIL NAJIM ABDULLAH
AL SHIMARI, et al.,
Plaintiffs,

v.

CACI INTERNATIONAL, INC., et al.,
Defendants.

Case No. 1:08-cv-827 (GBL-JFA)

ORDER

This MATTER is before the Court on Defendants CACI International, Inc. and CACI Premier Technology, Inc.'s Motion to Compel Plaintiffs' Depositions. (Dkt. No. 196.) For the reasons stated in open court on Thursday, February 14, 2013, it is hereby

ORDERED that Defendants’ Motion to Compel Plaintiffs’ Depositions (Dkt. No. 196) is GRANTED in PART; it is further

ORDERED that Plaintiffs shall make themselves available for depositions in the Eastern District of Virginia no later from thirty (30) days from the entry of this Order; it is further

ORDERED that Plaintiffs' counsel shall communicate with the Department of State, orally and in writing, forthwith to confirm the status of Plaintiffs' visa applications; it is further

ORDERED that following Plaintiffs’ depositions, Plaintiffs shall make themselves available for medical examinations at the expense of Defendants; it is further

ORDERED that the Court will take under advisement Defendants’ request for attorney’s fees.

IT IS SO ORDERED.

ENTERED this 14 day of February, 2013.

Alexandria, Virginia
02/14/2013

/s/
Gerald Bruce Lee
United States District Judge
THIS MATTER CAME ON FOR HEARING ON:

Conspiracy - granted.

Motion to Dismiss for Failure to State a Claim by CACI Premier Technology, Inc. and
Motion to Dismiss for Failure to State a Claim by CACI International, et al,

Findings granted. Employees dismissed with prejudice.

Oral mot. to permit deps. to dep. the week of March

18 - granted.

Orders to remain.
IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SUHAIL NAJIM ABDULLAH
AL SHIMARI, et al.,

Plaintiffs,

v.

CACI INTERNATIONAL, INC., et al.,

Defendants.

Case No. 1:08-cv-827 (GBL-JFA)

ORDER

THIS MATTER is before the Court on Plaintiffs' Motion for Extension to Complete Plaintiffs' Depositions. (Dkt. No. 231.) For the reasons stated in Plaintiffs' accompanying memorandum, and for good cause shown, it is hereby

ORDERED that Plaintiffs' Motion (Dkt. No. 231) is GRANTED. It is further

ORDERED that Plaintiffs shall make themselves available for depositions in the Eastern District of Virginia no later than April 5, 2013. It is further

ORDERED that Plaintiffs' counsel shall communicate with the Department of State, orally and in writing, forthwith to confirm the status of Plaintiffs' visa applications and to facilitate the necessary inter-agency coordination related to Plaintiffs' travel. It is further

ORDERED that following Plaintiffs' depositions, Plaintiffs shall make themselves available for medical examinations at the expense of Defendants.

IT IS SO ORDERED.

ENTERED this 7 day of March, 2013.

Alexandria, Virginia
3/7/2013

/s/
Gerald Bruce Lee
United States District Judge
CIVIL MOTION HEARING MINUTES

DATE: April 12, 2013   CASE NUMBER: 08cv827   START 10:00
JUDGE: Lee       REPORTER: R. Wilson   END 11:12

PARTIES: 
Suhail Najim Abdullah Al Shimari, et al.

V.
CACI Premier Technology, Inc.

ATTORNEYS:
George Mickum
Baker Azmy
Sherif Akeel

Bill Koegel
Joseph Shor for DOD
Eric Soskin
Scott Levin

THIS MATTER CAME ON FOR HEARING ON:
Deft's consent motion to seal
Deft's motion for sanctions [258](Absence Pltfs in Iraq)
Deft's motion to compel [261] Deposition. Discovery from the US
Pltffs' motion for extension of time to produce Pltffs for discovery
(Complete Pltffs Depositions)[271]

Heard and granted to 4-26-13, only. If Pltffs do not appear,
the Court will have to make a
Joint @ that time.

Heard. Findings stated, + denied.

EXHIBIT B
December 31, 2012

VIA E-MAIL
United States Embassy Baghdad
Consular Section
Al-Kindi Street
International Zone
Baghdad, Iraq
BaghdadNIV@state.gov

Re: Non-immigrant Visa for Suhail Najm Abdullah Shammar (Application No. CEACAA002TFJXF) to Appear as a Witness in Al Shimari v. CACI International, Inc. Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Suhail Najm Abdullah Shammar (Suhail Najim Abdullah Al Shimari) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Shammar (Application No. CEACAA002TFJXF) and to respectfully request the expedited processing of this application by your office. Mr. Shammar is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled Al Shimari v. CACI International, Inc. Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Shammar was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs’ Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

In October 2008, Mr. Shammar applied for a visa with the United States Embassy in Ankara, but that application was administratively closed due to inaction as the case had been delayed due to appeals filed in the United States Court of Appeals for the Fourth Circuit in 2009. Following the case’s reinstatement to the trial court, the case is now proceeding with discovery. A copy of the court’s Supplemental Discovery Order, dated November 6, 2012, is attached hereto as Exhibit C.

Mr. Shammar is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Shammar to the United States on two occasions: First, Mr. Shammar has been requested to appear for deposition in January 2013. A copy of the Notice of Deposition is attached hereto as Exhibit D. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Shammar fails to appear, there may be serious consequences, up to and
including dismissal of his claims. We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of torture against the defendant should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, *Al-Shimari v. CACI, Int’l, Inc.*, No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Shammarı, who has family and employment in Iraq, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

[Signature]

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in *Al-Shimari v. CACI*

Mohammed Alomari
Attorney and Counselor at Law

Enclosures
December 31, 2012

**VIA E-MAIL**
United States Embassy Baghdad
Consular Section
Al-Kindi Street
International Zone
Baghdad, Iraq
BaghdadNIV@state.gov

Re: Non-immigrant Visa for Asaad Hamzah Hanfoosh Alnamri (Application No. CEACAA002TFNAZ) to Appear as a Witness in *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Asaad Hamzah Hanfoosh Alnamri (Asa’d Hamza Hanfoosh Al-Zuba’e) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Alnamri (Application No. CEACAA002TFNAZ) and to respectfully request the expedited processing of this application by your office. Mr. Alnamri is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Alnamri was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs’ Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

In October 2008, Mr. Alnamri applied for a visa with the United States Embassy in Ankara, but that application was administratively closed due to inaction as the case had been delayed due to appeals filed in the United States Court of Appeals for the Fourth Circuit in 2009. Following the case’s reinstatement to the trial court, the case is now proceeding with discovery. A copy of the court’s Supplemental Discovery Order, dated November 6, 2012, is attached hereto as Exhibit C.

Mr. Alnamri is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Alnamri to the United States on two occasions: First, Mr. Alnamri has been requested to appear for deposition in January 2013. A copy of the Notice of Deposition is attached hereto as Exhibit D. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Alnamri fails to appear, there may be serious consequences, up to and including dismissal of
his claims. We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of torture against the defendant should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, *Al-Shimari v. CACI, Int’l, Inc.*, No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Alnamri, who has family and employment in Iraq, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in Al-Shimari v. CACI

Mohammed Alomari
Attorney and Counselor at Law

Enclosures
VIA E-MAIL
United States Embassy Baghdad
Consular Section
Al-Kindi Street
International Zone
Baghdad, Iraq
BaghdadNIV@state.gov

Re: Non-immigrant Visa for Taha Yaseen Arrak (Application No. CEACAA002TFPTZ) to Appear as a Witness in Al Shimari v. CACI International, Inc. Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Taha Yaseen Arrak (Taha Yaseen Arraq Rashid) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Arrak (Application No. CEACAA002TFPTZ) and to respectfully request the expedited processing of this application by your office. Mr. Arrak is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled Al Shimari v. CACI International, Inc. Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Arrak was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs' Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

In October 2008, Mr. Arrak applied for a visa with the United States Embassy in Ankara, but that application was administratively closed due to inaction as the case had been delayed due to appeals filed in the United States Court of Appeals for the Fourth Circuit in 2009. Following the case’s reinstatement to the trial court, the case is now proceeding with discovery. A copy of the court’s Supplemental Discovery Order, dated November 6, 2012, is attached hereto as Exhibit C.

Mr. Arrak is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Arrak to the United States on two occasions: First, Mr. Arrak has been requested to appear for deposition in January 2013. A copy of the Notice of Deposition is attached hereto as Exhibit D. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Arrak fails to appear, there may be serious consequences, up to and including dismissal of his claims.
We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of torture against the defendant should proceed to discovery and, potentially, trial. See Br. Am. Cur. United States, Al-Shimari v. CACI, Int’l, Inc., No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Arrak, who has family and employment in Iraq, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,

Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in Al-Shimari v. CACI

Mohammed Alomari
Attorney and Counselor at Law

Enclosures
EXHIBIT C
EXHIBIT D
I, Baher Azmy, hereby declare as follows:

1. I am the Legal Director of the Center for Constitutional Rights in New York, New York and counsel to the four plaintiffs in the above-captioned action. I have been admitted to appear *pro hac vice* in this action. I submit this Declaration in opposition to Defendant’s Motion for Sanctions against Plaintiffs Suhail Najim Abdullah Al Shimari, Asa’ad Hamza Hanfoosh Al-Zuba’e, and Taha Yaseen Araq Rashid.

2. Plaintiffs Suhail Najim Abdullah Al Shimari, Asa’ad Hamza Hanfoosh Al-Zuba’e, Taha Yaseen Araq Rashid, and Salah Hasan Al-Ejaili are Iraqi citizens who suffered torture and abuse while in U.S. custody in Abu Ghraib prison, and allege that CACI interrogators and supervisors operating in Abu Ghraib bear responsibility for Plaintiffs’ mistreatment.
3. Plaintiffs Al Shimari, Al-Zuba’e, and Rashid all currently reside in Iraq, either in or near Baghdad (collectively, the “Baghdad Plaintiffs”). Plaintiff Al-Ejaili currently resides in Doha, Qatar.

4. As foreign nationals, Plaintiffs are not permitted entry into the United States without a visa issued by the United States Department of State.

5. Plaintiffs submitted visa applications in 2008 at the U.S. Embassy in Ankara, Turkey (apparently, the U.S. Embassy in Baghdad was not then able to process visas) in anticipation for appearing in this litigation. Attached as Exhibit 1 are true and correct copies of Plaintiffs’ 2008 visa applications. Discovery in this action was subsequently stayed.

6. Immediately following the status conference before this Court on October 12, 2013, my then co-counsel, Susan Burke, Esq., began to re-engage Plaintiffs in their visa application process in anticipation of the Court’s lifting of the stay of discovery. Counsel believed that as litigation visas typically only last one year, it could have been premature to actually obtain visas prior to the entry of a discovery order, without more certainty about the scheduling of discovery and a potential trial.

7. Following the Court’s lifting of the stay of discovery on November 6, 2012, counsel for Plaintiffs planned to meet with the Plaintiffs in Istanbul, Turkey during the week of November 26, 2012, to discuss the status of the case and to ascertain further information about the filing and status of Plaintiffs’ 2008 visa applications. Plaintiffs’ counsel were concerned about applying for visas anew, when applications may have been pending with the U.S. Embassy. Plaintiffs’ counsel believed the utmost caution was necessary in processing these visas, lest a mistaken filing cause significant processing delay or lead to outright denial. However, the trip needed to be postponed due to scheduling difficulties.
8. On or about December 3, 2012, Susan Burke, Esq., who had been lead counsel for Plaintiffs throughout this litigation, concluded that she would be withdrawing from the case, and informed Plaintiffs’ counsel and Defendants’ counsel of this. She ceased working on the case since that date.

9. During the week of December 10, 2012, I and several co-counsel traveled to Istanbul, Turkey to meet with all four Plaintiffs. Counsel discussed with Plaintiffs – and our Iraqi coordinator, who has assisted with all aspects of this and other Abu Ghraib litigations since 2004 – the process and content of any prior applications for visas to enter the United States in connection with this litigation. During that trip, Plaintiffs’ counsel confirmed that the Baghdad Plaintiffs has previously submitted visa applications in 2008. See Ex. 1.

10. After returning from Istanbul, between December 17 and December 26, Plaintiffs’ counsel sought to confirm the status of the Baghdad Plaintiffs’ 2008 visa applications. Ascertaining this information was not an efficient process. For example, during the time period in which we attempted to reach it, the visa office at the U.S. Embassy in Ankara handled such inquiries for only one hour per day, between 4:00-5:00 a.m. Eastern Standard Time. We endeavored to ensure we were following the correct process, lest U.S. Embassy officials suspected us of filing duplicative or fraudulent petitions in separate Embassy locations.

11. Having been unsuccessful in connecting with a consular officer who could verify the status of the 2008 visas during calls on December 20th (when we learned of the limited hour to speak with a consular officer) and December 24th (when the Embassy was closed), on December 26, 2012, in a conversation with a consular official in Ankara, we were informed that Plaintiffs’ prior visa applications submitted in 2008 were, in fact, administratively closed in 2009, and we should file new visa applications for the Plaintiffs. As the Baghdad Plaintiffs
could now file visas with the U.S. Embassy in Baghdad and Plaintiff Al-Ejaili could file in Doha, and filing in their respective cities would facilitate Plaintiffs’ timely appearance for visa interviews without the logistical effort – an opportunity for possible delay – of flying Plaintiffs to Ankara, Plaintiffs’ counsel worked with Plaintiffs in submitting visa applications to the U.S. Embassies in Baghdad and Doha without delay.

12. At the same time, on December 17, 2012, William Koegel, Esq., counsel for Defendant, emailed me to request dates for depositions for Plaintiffs in January, 2013 in the Eastern District of Virginia. I responded by email dated December 18, 2012, that Plaintiffs were in the process of applying for visas and that, because the decision of whether and when to grant a visas to Plaintiffs was obviously out of Plaintiffs’ control, I could not predict when they would be available. I suggested that March was a more realistic time frame to ensure their availability. I also offered to make Plaintiffs available for depositions in Istanbul in January if Defendants wished to go forward with their depositions that month. Plaintiffs’ counsel did not believe that suggesting Istanbul as a possible venue for deposition would pose a problem to Defendant’s counsel.

13. By email dated December 19, 2012, Mr. Koegel attributed delay in this litigation to Plaintiffs, and asked that counsel inform him “specifically and in detail, exactly what Plaintiffs and their counsel have done for Plaintiffs to be able to appear in this country in this action and when each action was taken.” I responded on December 20, 2012, by objecting to attribution of blame for the delay in the litigation to Plaintiffs, resisting Defendant’s demand “for an accounting of our efforts” to obtain visas, and to reiterate that “we are in the process of obtaining visas for the plaintiffs (the outcome and timing of which, as you know, are not fully within
Plaintiffs control) and we fully intend to make them available in E.D.Va for depositions before the conclusion of the discovery period.” I also reaffirmed our commitment to make all of the Plaintiffs available for depositions in Istanbul in the meantime. Attached as Exhibit 2 is a true and correct copy of counsel’s email correspondence between December 19 and December 21, 2012.

14. On December 25, 2012, Plaintiff Al-Ejaili’s visa application was completed and submitted to the U.S. Embassy in Doha, Qatar. Attached as Exhibit 3 is a true and correct copy of the State Department’s confirmation of receipt of Plaintiff Al-Ejaili’s visa application submitted in 2012.

15. On December 27, 2012, counsel for Plaintiffs submitted a letter to the U.S. Embassy in Doha, requesting expedited processing of Plaintiff Al-Ejaili’s visa application. The letter described the proceedings in this case and the need to travel to this District for deposition and trial, and attached, as exhibits, Plaintiffs’ First and Second Amended Complaints and this Court’s November 6 Discovery Order. Attached as Exhibit 4 is a true and correct copy of the letter submitted by Plaintiffs’ counsel to the U.S. Embassy in Doha.


17. On December 31, 2012, visa applications for the Baghdad Plaintiffs were completed and submitted to the U.S. Embassy in Baghdad, Iraq. Attached as Exhibit 5 are true and correct copies of the State Department’s confirmations of receipt of the Baghdad Plaintiffs’ visa applications submitted in 2012.
18. Also on December 31, 2012, Plaintiffs’ counsel submitted letters to the U.S. Embassy in Baghdad, requesting expedited processing of the Baghdad Plaintiffs’ visas. Those letters were substantively identical to the letter counsel sent in support of Plaintiff Al-Ejaili’s visa application, except that they also attached the Notices of Depositions since served on each of the Baghdad Plaintiffs, in order to underscore the exigency of Plaintiffs’ visa requests.

19. Thereafter, the U.S. Embassy in Doha scheduled an interview of Plaintiff Al-Ejaili on January 9, 2013. The U.S. Embassy scheduled interviews of the Baghdad Plaintiffs and our Iraqi coordinator on or about January 23, 2013. Attached as Exhibit 6 are true and correct copies of notifications of Plaintiffs’ interviews with their respective embassies. All interviews took place on their scheduled dates. Plaintiffs at that point did not know how long it would take the visas to be processed following their interviews.

20. On January 9, 2013, I sent a letter to Mr. Koegel, counsel for Defendant, within the time frame contemplated by Local Rule 26(C), advising him that Plaintiffs objected to the Notice of Depositions insofar as all of the Plaintiffs would likely not have their visas in time to travel to the U.S. for the dates noticed. The letter affirmed Plaintiffs’ intention to appear in the Eastern District of Virginia and pledged to advise Defendants when the visas were completed, so Plaintiffs could sit for their depositions. The letter reiterated an offer to make Plaintiffs available for depositions in Istanbul, Turkey or Erbil, Iraq (in the semi-autonomous Kurdish area).

Attached as Exhibit 7 is a true and correct copy of the January 9 letter I sent to Mr. Koegel.

21. Defendant did not respond to this letter in any way – in writing or by phone. In subsequent conversations, Defendant did not raise the issue of Plaintiffs’ depositions or inquire about the status of Plaintiffs’ visas or propose to take depositions in the other locations Plaintiffs suggested. In fact, in a series of emails between Plaintiffs’ and Defendant’s counsel discussing
outstanding discovery issues and scheduling a time and agenda for a meet-and-confer,
Defendant’s counsel did not inquire into Plaintiffs’ availability or otherwise indicate any interest
in discussing or resolving the timing or location of Plaintiffs’ depositions.

22. On January 14, 2013, Plaintiff Al-Ejaili was informed by the U.S. Embassy that
his visa application was approved. From January 10 to 13, Plaintiff Al-Ejaili had traveled to
Erbil, Iraq to be examined by Plaintiffs’ medical expert retained for this litigation, and from
January 15 to February 7, 2013, he was sent on assignment in Sierra Leone as a reporter for Al
Jazeera Network. Even if Defendant had indicated that it wished to proceed with the depositions
of the four plaintiffs separately, Plaintiff Al-Ejaili would likely not have been available to attend
a deposition in the United States on February 1, 2013, pursuant to Defendant’s notice.

23. Upon Defendant’s motion, this Court issued an order on February 14, 2013
compelling Plaintiffs to appear in the Eastern District of Virginia for depositions and medical
exams, within 30 days. Following the issuance of this order, Plaintiffs’ counsel worked diligently
with State Department officials in Washington, D.C., in the Office of the Legal Advisor and the
in the Bureau of Democracy, Human Rights and Labor, to expedite the processing of the
Baghdad Plaintiffs’ visas. Attached as Exhibit 8 is a true and correct copy of a letter I sent to the
Department of State on February 15, 2013, as well as a true and correct copy of the FedEx slip
confirming the mailing of this letter.

24. By February 25, 2013, all four Plaintiffs’ applications for visas to the United
States were granted. Attached as Exhibit 9 are true and correct copies of screenshots taken from
the Department of State’s Consular Electronic Application Center “Visa Status Check” system
showing that the Baghdad Plaintiffs’ 2012 visa applications were granted.
25. Plaintiff Al-Ejaili appeared, without incident, in the United States for a medical examination and deposition during the week of March 4, 2013. He left the United States on March 6, 2013.

26. I worked with Defendant’s counsel to schedule the Baghdad Plaintiffs’ travel for a week during which both depositions and medical examinations could be held. Counsel for all parties agreed to the Baghdad Plaintiffs appearing for depositions during the week of March 18, 2013.

27. During a hearing on March 8, 2013, counsel moved jointly in asking the Court to modify its February 14, 2013 Order to allow depositions to be held during the week of March 18th. The Court granted that motion.

28. The Baghdad Plaintiffs’ depositions and medical examinations were scheduled to take place throughout the week of March 18, 2013.

29. Round-trip airline tickets were purchased for the Baghdad Plaintiffs to travel from Baghdad to the United States on Friday, March 15, 2013, on Turkish Airlines, at a cost of approximately $2,191.00 per ticket. A ticket was also purchased for our Iraqi legal-team member, who was to escort the Baghdad Plaintiffs to their connection in Istanbul, Turkey and assist them with their connection to the United States. The Iraqi team member is not a plaintiff in the case, and was not scheduled to be deposed. Attached as Exhibit 10 is a true and correct copy of the receipt for the purchase of those tickets.

30. In advance of the Baghdad Plaintiffs’ travel, Plaintiffs’ counsel coordinated with an official from the Department of Homeland Security Transportation Security Administration (TSA) to assist the Baghdad Plaintiffs upon arrival in the United States because none of them speak English and have extremely limited experience with air-travel and international travel.
Attached as Exhibit 11 is a true and correct copy of email correspondence between my co-counsel and a TSA official. Plaintiffs’ counsel also provided the Baghdad Plaintiffs with a letter explaining the nature of their travel. Attached as Exhibit 12 are true and correct copies of the letters given to the Baghdad Plaintiffs to carry on their persons while traveling.

31. Plaintiffs arrived at the Baghdad airport, with a travel itinerary that would take them to Chicago, via Istanbul, Turkey. They were scheduled to arrive in Chicago the evening of March 15, 2013, where they would be picked up by Plaintiffs’ counsel and an interpreter who reside in Detroit; this group was scheduled to travel together to Washington, D.C. on Sunday, March 17, in advance of the depositions scheduled that week.

32. The Baghdad Plaintiffs received boarding passes for their connecting flight to Istanbul. Attached as Exhibit 13 are true and correct copies of the Baghdad Plaintiffs’ boarding passes. After being issued their boarding passes, the Baghdad Plaintiffs proceeded to the gate to board their plane. Before boarding, the Baghdad Plaintiffs were taken for questioning, and subsequently informed that the airport agents had received a call from the United States directing them to not allow the Baghdad Plaintiffs to board the plane and that the Baghdad Plaintiffs would have to resolve the problem in the United States.

33. After being informed that the Baghdad Plaintiffs were not permitted to travel in the early morning of March 15, Plaintiffs’ counsel contacted both their contact at the TSA who had arranged for a TSA agent to meet the Baghdad Plaintiffs upon their arrival in the United States and the official at the Department of State (Ms. Kelly Landry, Foreign Affairs Officer in the Bureau of Democracy, Human Rights, and Labor) who had been my primary contact in relation to efforts to expedite the Plaintiffs’ visa processing.
34. Since March 15, Plaintiffs’ counsel has been working with and through Ms. Landry to resolve what has been explained to me as an inter-agency miscommunication regarding the Baghdad Plaintiffs and their travel to the United States.

35. As advised by the Department of State, despite being in possession of valid U.S. visas, the Baghdad Plaintiffs reapplied for visas to the United States on March 16, 2013, in order to allow for the necessary inter-agency communication and coordination, which had failed to occur when the visas were granted in February. Attached as Exhibit 14 are true and correct copies of confirmations of the State Department’s receipt of the Baghdad Plaintiffs’ 2013 visa applications.

36. The Baghdad Plaintiffs were then contacted by U.S. officials at the U.S. Embassy in Baghdad and advised to proceed to the Embassy for interviews on the next business day in Iraq, i.e., on Sunday, March 17. The Baghdad Plaintiffs appeared for their interviews on that date.

37. Over the following week of March 18, Plaintiffs’ counsel remained in daily, regular phone and email contact with the State Department, through Ms. Landry. Plaintiffs’ counsel provided requested information in response to updates on the Baghdad Plaintiffs’ travel, including providing an itinerary for travel to the United States on March 26, 2013, following an update that the Baghdad Plaintiffs’ visas would likely be processed and available for pick-up on Sunday, March 26.

38. I was informed by Ms. Landry on Friday, March 22, 2013, that the inter-agency coordination was continuing and that additional time would be needed to resolve the matter. She advised me that another government agency has taken the position that the Court’s Order regarding the appearance of Plaintiffs for deposition has expired and that this agency need not
therefore even consider the renewed request for Plaintiffs’ entry into this country, and that the issuance of a new order by the Court – as soon as possible – is necessary to facilitate the processing of the Baghdad Plaintiffs’ application to enter the United States.

39. Later that day, on March 22, 2013, Plaintiffs filed a motion with this Court, seeking an enlargement of time to complete Plaintiffs’ depositions, until April 5, 2013. Dkt. 231. Plaintiffs emphasized in their motion papers that, while we believed that setting an April 5, 2013 deadline would be useful in getting the relevant government agencies to act quickly, we had no assurance that the process would in fact be completed by April 5, 2013. As such, Plaintiffs noted that, should the process carry beyond April 5, 2013, Plaintiffs would keep the Court apprised of developments and requested that granting of an extension should be without prejudice to a subsequent request for additional time.

40. Specifically, Plaintiffs stated in the Memorandum of Law Supporting the Motion: “Plaintiffs understand that while a reasonable deadline – which Plaintiffs suggest would be April 5, 2013 – would put necessary pressure on the U.S. government to act on Plaintiffs’ visa applications, there is a possibility that the applications may not be fully processed in time for Plaintiffs to appear by April 5.” Dkt. 232 at 6. Accordingly, Plaintiffs would respectfully request that an order setting the deadline not preclude a subsequent enlargement of time, should Plaintiffs be able to represent that Plaintiffs’ entry and appearance for depositions could occur after the April 5th deadline. Id. at 6. See also id. at 7 (“Plaintiffs respectfully request that the Court grant Plaintiffs’ motion, and extend the period of time by which the Baghdad Plaintiffs must make themselves available for deposition to April 5, 2013, without precluding Plaintiffs from seeking a subsequent enlargement if it appears that approval for Plaintiffs’ entry into the United States is delayed beyond April 5, 2013 without fault of Plaintiffs.”).
41. On March 27, 2013 (in the early evening), the Court granted Plaintiffs’ motion, extended the deadline to appear for depositions to April 5, 2013, and ordered Plaintiffs to continue to work with the Department of State to ensure Plaintiffs’ timely arrival.

42. That same day, on March 27, 2013, I emailed a copy of this Court’s Order to Ms. Landry.

43. On March 28, 2013, I communicated with Ms. Landry by telephone. She informed me that, despite the Court’s order, it was unlikely that the Plaintiffs would have approval to travel by April 5. She advised me that we should make reservations with a specific itinerary in order to move forward with resolving issues related to the Baghdad Plaintiffs’ entry to the United States.

44. On March 29, 2013, Plaintiffs’ counsel provided the Department of State with an itinerary for the Baghdad Plaintiffs to travel to the United States. Based on the advice of Ms. Landry, we scheduled the itinerary so the Plaintiffs would arrive in Washington, D.C. three weeks from that date, i.e., on April 19, 2013, and to leave the United States on April 27, 2013.

45. Since then, Plaintiffs’ counsel regularly contacted Ms. Landry, by telephone and email, to inquire about any updates on the status of the Baghdad Plaintiffs’ travel to the United States.

46. As of today, the Department of State’s Consular Electronic Application Center “Visa Status Check” system continues to show the Baghdad Plaintiffs’ visa applications as in the “Administrative Processing” stage, with the last status update on March 17, 2013. Attached as Exhibit 15 are true and correct copies of screenshots of the U.S. State Department’s website showing the status of the Plaintiffs’ visas on April 10, 2013.
47. At no time during numerous communications with State Department officials has
Plaintiffs’ counsel been informed that the Baghdad Plaintiffs are on a watch-list or any database
that would cause them to be denied entry into the United States.

48. Despite its queries to State Department officials, Plaintiffs’ counsel has never
been informed of the name of the government agency with which the inter-agency coordination
supposedly had failed to occur. Nor has Plaintiffs’ counsel ever learned the identity of the
person or entity that called the airport agents in Baghdad and directed them to prevent the
Baghdad Plaintiffs from boarding their flight on March 15, 2013.

49. The Baghdad Plaintiffs continue to be available for video depositions at any time,
or for live depositions in Istanbul, Turkey.

50. Attached as Exhibit 16 are true and correct copies of the documents produced by
the Department of Defense in this litigation related to Plaintiff Al Shimari: DOD-00136;
DOD-00149; DOD-00150; DOD-00200; DOD-00215; DOD-00218; DOD-00262; DOD-308;
DOD-00323; DOD-00326.

51. Attached as Exhibit 17 are true and correct copies of the documents produced by
the Department of Defense in this litigation related to Plaintiff Rashid: DOD-00004; DOD-
00005; DOD-00016; DOD-00041; DOD-00061; DOD-00065.

52. Attached as Exhibit 18 are true and correct copies of the documents produced by
the Department of Defense in this litigation related to Plaintiff Al-Zuba’e: DOD-00106;
DOD-00107; DOD-00108.

53.
54. Attached as Exhibit 19 is a true and correct copy of a document produced by the Department of Defense in this litigation related to Plaintiff Al-Ejaili: DOD-00130.

55. Attached as Exhibit 20 is a true and correct copy of the expert report of Professor Geoffrey Corn submitted in this litigation on February 1, 2013.

56. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2013
New York, New York

______________________________
Baher Azmy
CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2013, I electronically filed the Plaintiffs’ DECLARATION OF BAHER AZMY through the CM/ECF system, which sends notification to counsel for Defendant.

/s/ George Brent Mickum
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