

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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ISA ALI ABDULLA ALMURBATI, <i>ET AL.</i> ,	)	
	)	
Petitioners,	)	
	)	
v.	)	
	)	Civil Action No. 04-1227 (RBW)
GEORGE WALKER BUSH, <i>ET AL.</i> ,	)	
	)	
Respondents.	)	
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**SUPPLEMENTAL DECLARATION OF MARK S. SULLIVAN, ESQ.**

I, Mark S. Sullivan, declare as follows:

1. I am a member of Dorsey & Whitney LLP, counsel for Petitioners in this action. I submit this declaration in further support of the application by Petitioner Jumah Al Dossari for a temporary restraining order and preliminary injunction. The facts set forth in this declaration are based upon my personal knowledge except where otherwise noted and relate to events that occurred subsequent to the filing of Mr. Al Dossari’s Motion for Temporary Restraining Order and Preliminary Injunction.

2. As counsel to Mr. Al Dossari, my colleague, Joshua Colangelo-Bryan, and I received clearance to visit him at the U.S. Naval Base at Guantánamo Bay, Cuba (“Guantánamo”) on November 12, 2005 and November 13, 2005.

3. On November 12, 2005, we visited Mr. Al Dossari at the Navy Hospital in Guantánamo. Mr. Al Dossari appeared very frail, most likely as a result of his multiple suicide attempts and the fact that he is currently participating in a hunger strike. In fact, Mr. Al Dossari’s physical health was so impaired that, for the first time since I have known him, he

remained in a wheel chair throughout the visit and we never saw him stand. Mr. Al Dossari also, at times, appeared to suffer from partial facial paralysis.

4. As the visit on November 12, 2005 neared the end, we assured Mr. Al Dossari that we would return to meet with him on the following day, as we were scheduled to do.

5. The next day, November 13, 2005, Colonel Vitale told me that we would not be permitted to visit Mr. Al Dossari for logistical reasons. I informed Colonel Vitale that we had promised Mr. Al Dossari that we would see him on this day and that we had received clearance for the visit. I cautioned Colonel Vitale that breaking the promise to visit Mr. Al Dossari would be extremely detrimental to him given his fragile mental state and his need for human interaction. Despite this warning, Colonel Vitale stated that it would be impossible for us to see Mr. Al Dossari.

6. According to the declaration of Dr. Edmondson, the following day - on November 14, 2005 - Mr. Al Dossari attempted to kill himself by opening the cut to his arm that he had made during his October 15, 2005 suicide attempt. *See* Declaration of Dr. John S. Edmondson submitted in support of Respondents' Opposition to Petitioners' Motion for Temporary Restraining Order and Preliminary Injunction at ¶ 10.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November, 21, 2005

/s/ Mark S. Sullivan  
MARK S. SULLIVAN