

Exhibit B

UNITED STATES OF AMERICA

DISTRICT OF COLUMBIA

GAILLARD T. HUNT deposes and says:

1. I am attorney for petitioner SAIFULLAH PARACHA in his petition for habeas corpus, Paracha v. Bush et al., No. 04cv02022-PLF. I am over 21 years of age and fully competent to testify as follows.
2. On or about May 8, 2006, I sent to Andrew Warden, Esq., the attached letter requesting appointment of an Islamic chaplain, or that access be allowed by an outside chaplain of the Islamic tradition.
3. From time to time thereafter I have discussed this request with Mr. Warden and he has assured me that there is no response. On June 14, 2006, I sent him an email saying I would assume my requests have been denied, and got no response.
4. My last visit to Guantanamo was June 19-22, 2006. At that time Mr. Paracha told me he had not seen a Bible, nor had he seen or heard of an available chaplain. I recently was able to clear and receive a letter from Mr. Paracha dated August 24, 2006, which says, "Still no Bible."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on:

_____/s/_____
GAILLARD T. HUNT

May 8, 2006

Andrew Warden, Esq.
Department of Justice, Civil Division, Federal
Programs Branch, Room 6120
20 Massachusetts Avenue NW
Washington, D.C. 20530

Re: Paracha v. Bush, 04cv02022-PLF

Dear Mr. Warden:

The February 15 or 27, 2006, report of the United Nations special Rapporteur on religious freedom pointed out that the prisoners at Guantanamo have not had an Islamic chaplain for some time. (Paragraph 64.)

I have found an Islamic chaplain who is cleared to visit in both the South Carolina state prisons and Federal prisons. I hereby request, or request that you request DoD, that he be allowed to visit prisoners at Guantanamo in general and Saifullah Paracha in particular. I further request that the government bear his expenses, or at least let him go down on military flights. If this is not possible the request is that he visit at his own expense.

The chaplain I have found is Mutahhir Sabree, of Columbia South Carolina. I also hereby request that one of the Islamic chaplains already in the U.S. Armed Services -- I understand there are about ten or twelve -- be reassigned to minister to the prisoners at Guantanamo as soon as possible.

Yours truly,

Gaillard T. Hunt
Attorney for Saifullah Paracha