

DECLARATION OF ZACHARY PHILIP KATZNELSON

1. My name is Zachary Katznelson. I am a member of the Bar of the State of California, Bar Number 209489.
2. I represent habeas petitioner Saifullah Paracha in *Paracha v. Bush*, Case No. 04-CV-2022 (PLF).
3. Everything in this declaration is unclassified.
4. On November 9 and 11, 2006, I met with Mr. Paracha in Guantánamo Bay.
5. Before meeting with Mr. Paracha, I had no knowledge of Mr. Paracha's medical condition.
6. On November 9, 2006, two hours into my first meeting with Mr. Paracha, I was handed an e-mail message from counsel for Respondents, Andrew Warden, explaining that Mr. Paracha needed a cardiac catheterization.
7. At my first meeting with him, Mr. Paracha explained that he has suffered two heart attacks. The first was in 1995, while a free man. The second was suffered in U.S. military custody at Bagram Airforce Base, Afghanistan in 2003.
8. Mr. Paracha told me that on October 15, a cardiologist visiting Guantánamo diagnosed Mr. Paracha as having a blockage in one of his arteries. The doctor prescribed a cardiac catheterization at that time.
9. Mr. Paracha stated that on November 7, 2006 he experienced chest pains while in his cell. He called the guards, who brought in a medical technician. The technician took his blood pressure. It was quite low (around 90 over 58). Mr. Paracha's pulse was measured

at around 46 beats per minute, also quite low. Mr. Paracha was then taken to the main naval hospital in Guantánamo.

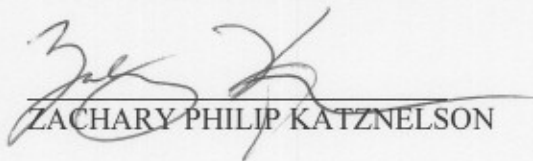
10. Mr. Paracha reported that in the hospital, the staff gave him an electro-cardiogram and various blood tests. As there is no cardiologist in Guantánamo (the visiting cardiologist mentioned above having left the base), the test results were sent to a consulting military cardiologist elsewhere. The cardiologist found that Mr. Paracha had not suffered a third heart attack. However, the doctor stated that the chest pains make the catheterization procedure more urgent – the pain indicates not enough blood is flowing to certain areas of the heart because one of the arteries is clogged.
11. Mr. Paracha reported during our second meeting on November 9, 2006, that he had experienced minor chest pains and difficulty breathing the day before, November 8, 2006. He stated that he reported this immediately to medical staff.
12. Mr. Paracha expressed to me his grave concern at Respondents' proposal to perform in Guantánamo Bay the cardiac catheterization and any surgery and aftercare that may necessarily follow. He stated that the hospital in Guantánamo is not equipped at all to provide such care. He expressed deep concern at Respondents' proposal to import the personnel and equipment required for the catheterization and subsequent treatment and aftercare. Mr. Paracha particularly raised the point that the equipment being sent to Guantánamo for the procedure and possible open-heart surgery will not be tried and tested, as would be the case in an established hospital. Further, he was concerned that there would not be any back-up procedures or equipment available, as there would be in an established hospital, should one of the machines, such as the bypass machine, fail

during surgery. In short, he was deeply worried that the government could not provide him adequate care in Guantánamo.

13. I declare under penalty of perjury under the laws of the United States that the foregoing is true to the best of my knowledge and belief.

London, England

DATE: November 14, 2006


ZACHARY PHILIP KATZNELSON