# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LAKHDAR BOUMEDIENE; ABASSIA

BOUADJMI, as Next Friend of Lakhdar

Boumediene; MOHAMMED NECHLA,

BADRA BAOUCHE, as Next Friend of

Mohammed Nechla,

Petitioners,

- vs. —

Second Walker Bush, President

of the United States of America; DONALD

RUMSFELD, Secretary of the Defense;

GENERAL JAY HOOD, Commander, Joint

Task Force; COLONEL NELSON J. CANNON,

Commander, Camp Delta; in their individual

and official capacities,

Respondents.

#### MOTION FOR PRO HAC VICE ADMISSION OF PEGGY KUO

I, CHRISTOPHER J. HERRLING, hereby move pursuant to Local Civil Rule 83.2(d) for the *pro hac vice* admission of Peggy Kuo to the bar of this Court to act as co-counsel in this action.

Ms. Kuo is Counsel to the law firm of Wilmer Cutler Pickering Hale and Dorr LLP in New York, NY and is a member in good standing of the Bars of the State of New York, the State of New Jersey, and the District of Columbia.

On the basis of the foregoing, it is respectfully requested that this Court admit Ms. Kuo *pro hac vice* for the purpose of appearing and participating as co-counsel on behalf the Petitioners in this action.

Respectfully submitted,

/s/ Christopher J. Herrling
Christopher J. Herrling, Bar No. 151993
WILMER CUTLER PICKERING HALE
AND DORR LLP
2445 M Street, N.W.
Washington, DC 20037-1420
(202) 663-6000

Attorneys for Petitoners

Dated: July 20, 2004

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

-X LAKHDAR BOUMEDIENE; ABASSIA BOUADJMI, as Next Friend of Lakhdar Boumediene; MOHAMMED NECHLA, BADRA BAOUCHE, as Next Friend of Mohammed Nechla, Petitioners, No. 04-1166 (RJL) --- vs. ---GEORGE WALKER BUSH, President of the United States of America; DONALD RUMSFELD, Secretary of the Defense; GENERAL JAY HOOD, Commander, Joint Task Force; COLONEL NELSON J. CANNON, Commander, Camp Delta; in their individual and official capacities, Respondents. -X

#### **DECLARATION OF PEGGY KUO**

I, PEGGY KUO, declare pursuant to 28 U.S.C. § 1746:

- 1. I am Counsel to the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, 399 Park Avenue, New York, NY 10022, counsel for Petitioners in the above-captioned action. I submit this declaration in support of Christopher J. Herrling's July 20, 2004 Motion pursuant to Local Civil Rule 83.2(d) for the *pro hac vice* admission of Peggy Kuo to the bar of this Court.
  - 2. My full name is Peggy Kuo.
- 3. My office address is 399 Park Avenue, New York, NY 10022. My office telephone is (212) 230-8827.

- 4. I am admitted to the bars of the State of New York, the State of New Jersey, and the District of Columbia.
  - 5. I have not been admitted *pro hac vice* to this Court in the previous two years.
- 6. I do not engage in the practice of law from an office located in the District of Columbia. I am a member of the District of Columbia Bar.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York on July 20, 2004.

Peggy Kuo

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

	X	
LAKHDAR BOUMEDIENE; ABASSIA	:	
BOUADJMI, as Next Friend of Lakhdar	:	
Boumediene; MOHAMMED NECHLA,	:	
BADRA BAOUCHE, as Next Friend of	:	
Mohammed Nechla,	:	
Petitioners,	:	
— vs. —	:	No. 04-1166 (RJL)
	:	
GEORGE WALKER BUSH, President	:	
of the United States of America; DONALD	:	
RUMSFELD, Secretary of the Defense;	:	
GENERAL JAY HOOD, Commander, Joint	:	
Task Force; COLONEL NELSON J. CANNON,	;	
Commander, Camp Delta; in their individual	:	
and official capacities,	:	
Respondents.	:	
	X	

### [PROPOSED] ORDER

Upon consideration of the Motion of Christopher J. Herrling for *Pro Hac Vice* Admission of Peggy Kuo, dated July 20, 2004, it is hereby

ORDERED that Peggy Kuo be specially admitted to appear and participate in the above-captioned matter as co-counsel to Mr. Herrling, attorney of record to the Petitioners.

Dated: July, 2004	
	United States District Judge

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LAKHDAR BOUMEDIENE; ABASSIA BOUADJMI, as Next Friend of Lakhdar Boumediene; MOHAMMED NECHLA, BADRA BAOUCHE, as Next Friend of Mohammed Nechla, Petitioners, No. 04-1166 (RJL) --- vs. ---GEORGE WALKER BUSH. President of the United States of America; DONALD RUMSFELD, Secretary of the Defense; GENERAL JAY HOOD, Commander, Joint Task Force; COLONEL NELSON J. CANNON, Commander, Camp Delta; in their individual and official capacities, Respondents.

#### **Certificate of Service**

- I, Jon Connolly, declare and say:
- 1. I am one of the attorneys for Petitoners in this action. The purpose of this declaration is to document my arrangements for service in this matter.
- 2. On July 21, 2004, I arranged for delivery of the foregoing document, MOTION FOR PRO HAC VICE ADMISSION OF PEGGY KUO, via United States first class mail, postage prepaid, to the following parties:

The Honorable Kenneth L. Wainstein Interim US Attorney for the District of Columbia Judiciary Center 555 4th Street, N.W. Washington, D.C. 20530

The Honorable John D. Ashcroft Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530 The Honorable Donald Rumsfeld, Secretary, United States Department of Defense 1000 Defense Pentagon Washington, D.C. 20301-1000

Army Brigadier General Jay Hood Commander, Joint Task Force- GTMO Guantanamo Bay Naval Station Guantanamo Bay, Cuba

Army Colonel Nelson J. Cannon Commander, Camp Delta Guantanamo Bay Naval Station Guantanamo Bay, Cuba

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this twenty-first day of July, 2004.

Jon Connolly

WILMER CUTLER PICKERING HALE

AND DORR LLP

399 Park Avenue

New York, NY 10022

(212) 230-8800

Attorneys for Petitioners