

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

DAVID M. HICKS,

Petitioner,

v.

GEORGE W. BUSH, President of the United States; )  
DONALD RUMSFELD, United States Secretary of )  
Defense; GORDON R. ENGLAND, Secretary of the )  
United States Navy; JOHN D. ALTENBURG, JR., )  
Appointing Authority for Military Commissions, )  
Department of Defense; Brigadier General JAY )  
HOOD, Commander, Joint Task Force, Guantanamo )  
Bay, Cuba, and Colonel BRICE A. GYURISKO, )  
Commander, Joint Detention Operations Group, )  
Joint Task, Guantanamo Bay, Cuba )

Respondents, all sued in their )

individual and official capacities. )

Civ. Act. No. 1:02-cv-00299-CKK

Judge Kollar-Kotelly

**UNOPPOSED MOTION OF LOUISE DOSWALD-BECK, GUY S. GOODWIN-GILL,  
FRITS KALSHOVEN, VAUGHAN LOWE, MARCO SASSÒLI, AND THE CENTER  
FOR INTERNATIONAL HUMAN RIGHTS OF NORTHWESTERN UNIVERSITY  
SCHOOL OF LAW FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE* IN SUPPORT  
OF DAVID M. HICKS'S PETITION FOR WRIT OF MANDAMUS PURSUANT TO  
28 U.S.C. § 1361 OR, IN THE ALTERNATIVE, WRIT OF HABEAS CORPUS**

Louise Doswald-Beck, Guy S. Goodwin-Gill, Frits Kalshoven, Vaughan Lowe,  
Marco Sassòli, and the Center for International Human Rights of Northwestern  
University School of Law hereby move for leave to file the attached brief as *amici curiae*  
in support of David M. Hicks's Petition for Writ of Mandamus Pursuant to 28 U.S.C.  
§1361 or, in the alternative, Writ of Habeas Corpus. In support of this motion, *amici*  
state as follows:

1. Louise Doswald-Beck is a Professor of the Graduate Institute of International Studies and Director of the University Centre for International Humanitarian Law in Geneva, Switzerland. She was a legal adviser at the International Committee of the Red Cross from 1987 to 2001, and became Head of the Legal Division in 1998. She has written extensively on international humanitarian and human rights law, and played a major role in the negotiations leading to various international legal instruments.

2. Guy S. Goodwin-Gill is Senior Research Fellow, All Souls College, University of Oxford, where he was formerly Professor of International Refugee Law. He served as Legal Advisor in the Office of the United Nations High Commissioner for Refugees from 1976-1988. He founded the International Journal of Refugee Law and was Editor-in-Chief from 1989-2001.

3. Frits Kalshoven is Professor Emeritus of Public International Law and International Humanitarian Law at the University of Leiden. He took part in the diplomatic conferences on "Reaffirmation and Development of International Humanitarian Law Applicable in Armed Conflicts" that negotiated the 1977 Protocols to the Geneva Conventions of 1949, and was Chairman of the United Nations Commission of Experts to investigate war crimes committed in the former Yugoslavia. In 2002, he was awarded the Henry Dunant Medal of the International Red Cross and Red Crescent Movement for his continued effort toward improved knowledge of and respect for international humanitarian law.

4. Vaughan Lowe is Chichele Professor of Public International Law at Oxford University and a Fellow of All Souls College at Oxford. He practices as a

barrister from Essex Court Chambers, London. A member of the Executive Council of the American Society of International Law, and of the Councils of the British Institute of International and Comparative Law and the European Society of International Law, he has written many books and articles on international law and is Co-Editor of the British Yearbook of International Law. He serves as a trainer on the laws of war for British Naval officers.

5. Marco Sassòli is Professor of International Law at the University of Geneva, Switzerland and Associate Professor at the University of Quebec in Montreal. He was recently elected President of the Governing Council of the University Centre for International Humanitarian Law in Geneva, Switzerland, and is a former Deputy Head of the International Committee of the Red Cross' Legal Division.

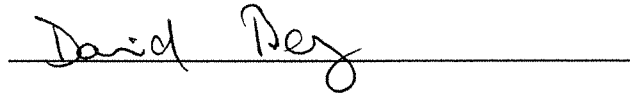
6. The Center for International Human Rights of Northwestern University School of Law fosters the use of international law to promote human rights, democracy and the rule of law. The Center engages in education, research, technical assistance and advocacy in support of international human rights and humanitarian law.

7. *Amici* wish to submit this brief because of their long-standing commitment to respect for international humanitarian and human rights law, and their conviction that the military commission procedures established for the trial of certain Guantanamo detainees, including petitioner David M. Hicks, violate those norms.

8. Counsel for *amici* contacted counsel for Petitioner and Respondents regarding this motion. Counsel for all parties stated that they have no objection to the motion.

WHEREFORE, Louise Doswald-Beck, Guy S. Goodwin-Gill, Frits Kalshoven, Vaughan Lowe, Marco Sassòli, and the Center for International Human Rights of Northwestern University School of Law respectfully request the Court to grant their motion for leave to file their brief *amicus curiae*. The proposed order is attached.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "David Berz", is written over a horizontal line.

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Dated: November 1, 2004