

סמדר בן-נתן, משרד עורכות-דין

SMADAR BEN-NATAN, LAW OFFICES

תל-אביב-יפו 10 הרח' הוברמן 6407509 Tel-Aviv-Jaffa
טל: 03-5619666, 03-5320076 tel: פקס: 03-6868596
Email: office@bennatan-law.co.il

SMADAR BEN-NATAN, ADV.
GALIT LUBETZKY, ADV.
MICHAL POMERANZ, ADV.
RACHEL HEFETZ, ADV.
ANU DEULLE LUSKI, ADV.

סמדר בן-נתן, עו"ד
גלית לובצקי, עו"ד
מיכל פומרנץ, עו"ד
רחלי חפץ, עו"ד
אנו דעואל לוסקי, עו"ד

Disclaimer: The following is a non-binding translation of the original Hebrew document. It is provided by **HaMoked: Center for the Defence of the Individual** for information purposes only. The original Hebrew prevails in any case of discrepancy. While every effort has been made to ensure its accuracy, **HaMoked** is not liable for the proper and complete translation nor does it accept any liability for the use of, reliance on, or for any errors or misunderstandings that may derive from the English translation. **For queries about the translation please contact site@hamoked.org.il**

November 17, 2015

To:
Adv. Daniel Solomon
Legal Adviser
Population Administration
By fax 02-6294836

Re: **Demand for 30 Days Leave to Submit Written Arguments Prior to a Decision in the Matter of my Clients**

Mr. Dwayat, ID No.,

Mr. Abu Kaf, ID No.,

Mr. Atrash, ID No.,

Ref: My letters dated November 10, 2015 and November 16m 2015, your letter dated November 17, 2015

1. Following on the correspondence in reference, and without prejudice to our arguments that proper administrative conduct requires a stay of residency revocation proceedings pending the ruling of the High Court on the general question of the Minister of Interior's powers, I am contacting you with respect to your notice regarding the possibility to submit written arguments in the matter of my clients by December 8, 2015.
2. First, as noted, I personally received confirmation, over the telephone, with respect to receipt of the letter sent by HaMoked on October 22, 2015 (given by a staff member named Noam), such that, even if you are not aware of same, it has occurred, and it is regrettable that urgent letters are not provided to the relevant officials for processing. Certainly, this fact should not be a detriment to my clients.
3. In any event, the basis for your determination of December 8, 2015 as the deadline for submission of arguments is entirely unclear to me. It is inconceivable that the date on which a letter was

סמדר בן-נתן, משרד עורכות-דין

SMADAR BEN-NATAN, LAW OFFICES

תל-אביב-יפו 10 הרח' הוברמן 6407509 Tel-Aviv-Jaffa st. Huberman 10
טל: 03-5619666, 03-5320076 tel: פקס: 03-6868596 fax:
Email: office@bennatan-law.co.il

SMADAR BEN-NATAN, ADV.
GALIT LUBETZKY, ADV.
MICHAL POMERANZ, ADV.
RACHEL HEFETZ, ADV.
ANU DEULLE LUSKI, ADV.

סמדר בן-נתן, עו"ד
גלית לובצקי, עו"ד
מיכל פומרנץ, עו"ד
רחלי חפץ, עו"ד
אנו דעואל לוסקי, עו"ד

produced in Hebrew to detainees held on security charges who do not speak the language, cannot make telephone calls and receive family visits once every two weeks, should count as the date on which the time allotted for submission of written arguments begins, certainly given the fact that these arguments concern a fateful decision such as a decision to revoke residency. It is clear, from my letters sent a week ago, that we were not aware of the minister's notices with respect to Mr. Abu Kaf, Mr. Atrash and Mr. Abu Ghanem, and it is not clear why it took a week to notify us thereof.

4. It follows that, as detailed in my letters in reference, the date that should be considered as the date on which notices were produced should be November 9, 2015 for Mr. Dwayat, November 12, 2015 for Mr. Abu Kaf and Mr. Atrash and November 17, 2015 for Mr. Abu Ghanem. Accordingly, the deadlines for submission of our written arguments should be December 9, 2015 for Mr. Dwayat, December 12, 2015 for Mr. Abu Kaf and Mr. Atrash and December 17, 2015 for Mr. Abu Ghanem.

Sincerely

[signed]
Michal Pomeranz, Adv.