

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**

At the Supreme Court
Sitting as the High Court of Justice

HCJ 8134/14

1. _____ Abu Jamal, ID No. _____
2. _____ Abu Jamal, ID No. _____
3. _____ Abu Jamal, ID No. _____
4. _____ Abu Jamal, ID No. _____
5. **HaMoked: Center for the Defence of the Individual,
founded by Dr. Lotte Salzberger**

all represented by Adv. Agsteribbe; Adv. Diamond
of HaMoked Center for the Defence of the Individual, founded
by Dr. Lotte Salzberger
4 Abu Obeida St., Jerusalem, 97200
Tel: 02-6283555; Fax: 02-6276317

The Petitioners

v.

1. **Minister of Interior**
2. **Chair of the Interior Minister's Humanitarian Advisory Committee**
3. **Head of Population and Immigration Authority**
4. **Minister of Public Security**

represented by the State Attorney's Office
29 Salah a-Din Street, Jerusalem
Tel: 02-6466590, Fax: 02-6466713

The Respondents

Response on behalf of the State

In accordance with the decisions of the Honorable Court (Justice Daphne Barak-Erez) on November 30, 2014 and November 3, 2014, the State respectfully submits its response as follows.

1. The captioned petition involves the demand of Petitioner 1, mother of Petitioners 2-4 and widow of one of the perpetrators of the terrorist attack on the synagogue in the Har Nof neighborhood, to revoke [sic] her Israeli stay permit.
2. As it emerges from the petition and its appendices, the Petitioner is registered in the Population Registry in the Area and has resided in Israel (with a DCO permit) under a family unification procedure with her husband, who was registered as a permanent resident in the Israeli Population Registry. Following the husband's death, the graduated procedure was halted and the matter brought before the Interior Minister's advisory committee for a recommendation according to Section 3A1 of the Citizenship and Entry into Israel Law (Temporary Order) 5763-2013.
3. In their petition for interim injunction, the Petitioners focus on the question of the right to a hearing and the right to argue their case.
4. Without going into the merit of the petition at this stage, and without prejudice, the State maintains that to the extent the Petitioners have arguments beyond those stated in the petition, which they believe are important to present to the Minister of Interior, they are free to convey them in writing. They may do so within a week or any other amount of time determined by the Honorable Court.
5. Inasmuch as such arguments are received, and upon receipt thereof, Petitioners' arguments will be examined and the State will provide the court with a supplementary notice with respect to all issues raised in the petition.
6. At this point, therefore, we suggest allowing the Petitioners, if they are so inclined, to present all their arguments in writing to the Minister of Interior within one week. We also suggest that the State be instructed to submit a supplementary notice within two weeks thereafter.

Today, 8 December, 2014 (16 Kislev, 5775)

[signed]

Nahi Ben Or, Adv.
Senior Deputy (A)
State Attorney