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At the Jerusalem Magistrate Court

RCP 45391-05-15

In the matter of: 1. _____ **al-Ghul, ID No.** _____
 Represented by counsel, Adv. Andre Rosenthal –
 License Number 11864
 **On behalf of HaMoked: Center for the Defence of
 the Individual, founded by Dr. Lotte Salzberger**
 Whose address for service of process is at
 15 Salah a-Din St., P.O.Box 19504, Jerusalem 91194
 Tel: 6280458, Fax: 6221148

The Applicant

v.

State of Israel
 Represented by the office of the legal advisor
 for the Home Front Command
 Tel: 08-9784244; Fax: 08-9784134

The Respondent

Request for the Return of Confiscated Property

The honorable court is requested to order the respondent, or anyone on its behalf, to return the computers which were taken from Applicant's home in Ras al 'Amud, Jerusalem, during a search which was conducted on December 10, 2014.

The grounds for the petition are as follows:

1. Removal orders from Jerusalem were issued against the Applicant by the GOC Home Front Command. The current order is in force until August 29, 2015, and a hearing before the Supreme Court against the order – HCJ 3219/15 – has not yet been scheduled.
2. On December 10, 2014, policemen from the Jerusalem Special Assignments Unit searched Applicant's home and confiscated several computers. A copy of the search report is attached and marked A/1.
3. On February 26, 2015, Applicant's counsel turned to Major Efrat Shitrit-Pariente, the legal advisor for the GOC Home Front Command, who signed the removal orders, and requested to receive the position of the commander regarding the return of said computers. A copy of the above request is attached and marked A/2.

4. As no reply has been received for this request, Applicant's counsel wrote again to Major Shitrit-Pariente. A copy of said letter dated April 6, 2015, is attached and marked **A/3**.
5. On April 12, 2015, Applicant's counsel wrote again to the office of the legal advisor for the Home Front Command and asked whether it was necessary to turn to court in order to receive a response. A copy of said letter is attached and marked **A/4**.
6. On April 16, 2015, notice was given by Major Pariente that "Israel Police will send your client a notice according to which your client or his family members may arrive to the police station and receive the equipment which was confiscated."

A copy of said reply is attached and marked **A/5**.
7. On May 7, 2015, following an inquiry with the Jerusalem Special Assignments Unit, Applicant's counsel sent the letter of Major Pariente in an attempt to promote the return of the computers.

On the same day Applicant's counsel sent an additional, and last letter to Major Pariente. A copy of said letter is attached and marked **A/6**.
8. Prior to the submission of this request Applicant's counsel tried to contact the office of the legal advisor for the Home Front Command by telephone as well as Major Pariente through her cellular phone, with no success.
9. In view of the position of the office of the legal advisor for the Home Front Command, Exhibit A/5, and the inability to execute it, the honorable court is requested to order the Special Assignments Unit – Jerusalem to hand over the computers to the applicant or his family members within 48 hours.

Jerusalem, today May 21, 2015.

(Signature)

Andre Rosenthal, Advocate
Counsel to the applicant