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At the Magistrates Court in Jerusalem

CC 63728-10-15

In the matter of: **1. Abu Jamal, ID _____**
 2. Abu Jamal, ID _____
 3. Abu Jamal, ID _____
 4. Abu Jamal, ID _____
 5. Abu Jamal

Represented by attorneys Ghada Hliehel and/or Amar Yassin
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The Plaintiffs

v.

1. GOC Home Front Command
2. The State of Israel – Ministry of Defense

Represented by the Jerusalem District Attorney’s Office (Civil)
7 Mahal Street, Jerusalem
POB 49333, Jerusalem 91493
Tel: 02-5419532, Fax: 02-5419581

The Respondents

**Urgent Motion for a Mandatory Injunction prior to the Submission of a Petition
and Request to schedule an Urgent Hearing on the Motion**

“Fathers shall not be put to death because of their sons, and sons shall not be put to death because of their fathers, but a man shall be put to death for his own sin”

The Honorable Court is requested to grant a mandatory injunction ordering the Respondents as follows:

- A. To compel the Respondents immediately send a contractor on their behalf to remove the rubble remains of the apartment of Abu Jamal located in the neighborhood of Jabal Mukaber in East Jerusalem (coordinates:) which was seized and demolished by explosives on October 6, 2015, and of the adjacent flat, which are in danger of collapse and pose a severe concrete and immediate danger to life and property.
- B. Alternatively to grant the Plaintiffs the authorization to enter the apartment and take all necessary action to prevent further damage to other parts of the building, including the removal of the rubble remains that are about to collapse and which constitute a hazard that endangers life and property, and to order the Respondents to bear the cost of clearing the rubble.

- C. Or alternatively, until the matter is settled, to arrange alternative housing for the Plaintiffs and their families that number 22 persons.
- D. In light of the concrete and immediate danger and the urgency of the order requested, to schedule a date for an urgent hearing of the matter in the presence of the parties.

The Arguments of the Motion:

The Parties:

1. The Plaintiffs are all members of one family – that of a father and his sons. Plaintiff 1 is the father of Plaintiffs 2 -4 and also the father of Mohammed Ali Abu Jamal who on November 18.11.2014 committed the attack at the synagogue in the Har Nof neighborhood of Jerusalem in which several people were killed and injured including he himself.
2. The path that chose is contrary to all the values and principles the Plaintiffs and their families believe in and according to which they were raised. The Plaintiffs condemn and oppose all violent and terrorist activities and the harming of innocent civilians. Had the Plaintiffs or any of the building's residents known of intention, they would have done all they could to stop him.
3. The Plaintiffs are the owners and/or holders and/or users of the residential apartments in the building in which e the assailant's apartment is located.
4. The Respondents are as defined by their titles: Respondent 1 is the Commander of the Home Front Command, and Respondent 2 is the Ministry of Defense of the State of Israel. The Respondents are the offenders in relation to the Plaintiffs and/or are the ones who issued a seizure and demolition order and carried out, through their agents, the demolition in the apartment of the assailant that caused severe damage to other parts of the building. In addition, the Respondents are responsible for the seized apartment – Ghassan's apartment, whose rubble remains pose a danger, and are required by law to remove the hazards and/or maintain the apartment in a manner that will avert damage to nearby apartments.

Description of the Building:

5. The family's home is located in the Jabal Mukaber neighborhood in East Jerusalem (coordinates....). The house includes two main floors and a basement whose area totals 685 meters.
6. 22 residents, including minors, belonging to the Abu Jamal family live in the building.

7. There are 2 adjacent apartments with a shared common wall on the upper floor. The western one, which was demolished belongs to Abu Jamal (hereinafter: Ghassan”). The family of his brother, Plaintiff 2, Abu Jamal, lives in the apartment on the eastern side.
Three families live on the ground floor. The family of the brother A. (Plaintiff 3) lives on the south side, the family of the father M. (Plaintiff 1) lives in the center, and the family of the brother J. (Plaintiff 5) lives on the north side. The family of the brother M. (Plaintiff 4) lives in the basement.
8. The building was built in the conventional manner with concrete walls and blocks. The outer walls of the building are coated with stone.

The Seizure and Demolition Order and the Ruling on the Petition:

9. On November 11, 2014, a notification was given to the Plaintiffs and/or their representatives regarding the intention of Respondent 1 to demolish the house where the assailant had lived, and they were given a stay of 48 hours to file an objection against the execution of the demolition.
10. On November 23, 2014, an objection was filed, and later dismissed. On November 25, 2014, a seizure and demolition order was issued against the assailant’s apartment.

In his rejection of the objection, Respondent 1 indicated that the apartment located on the ground floor, the third from the northeast direction, in the neighborhood of Jabal Mukaber (coordinates:) which was the residence of the assailant and his nuclear family will be seized and destroyed.

In accordance with the diagram attached to the demolition order, it was made clear that the Respondent intends to destroy parts of the assailant’s apartment including: the toilet, shower, kitchen, part of the hallway and three rooms. The diagram also reveals that the Respondent intends to blast these sections of the apartment, which would surely cause damage to other parts of the apartment and the building as a whole.

The Respondent, in his rejection of the objection noted that “**the impact of the demolition on the residents of adjacent buildings was examined, while ensuring that no damage will be caused by the demolition to buildings adjacent to the assailant’s house**”.

11. On November 27, 2014, a petition was submitted to the Supreme Court (HCJ 8066/14 **HaMoked Center for the Defence of the Individual et. Al v. the Home Front Command**) in which the Petitioners requested to annul the demolition order. The Petitioners argued that, *inter alia*, the demolition as planned may cause damage to the rest of the building.
12. The Petitioners submitted an engineering expert opinion on their behalf. In the opinion it was indicated that the planned demolition may bring about the collapse of the entire building, even if an effort is made to only demolish Ghassan’s apartment. In the chapter concerning the conclusions to his opinion, the engineer, Tayser Jabareen, noted that “**the demolition of part of the structure that was built in a monolithic form with a continuous static scheme will alter the static**

scheme of the beams and the continuous ceilings and cause unplanned overloads on the other elements of the structure. Overloads will be caused by both the blast itself and by the removal of key components of the constructive structure. In the case at hand, the demolition of constructive elements – columns, beams, and the ceiling – in the upper floor will cause critical damage that may lead to a collapse of the entire structure due to a chain reaction. In order to prevent this from occurring, permanent reinforcement of all of the floors of the structure should be erected in advance using concrete or steel constructions. The construction of the reinforcement will be supervised by an engineer and include proper quality control follow up”.

A copy of the expert opinion is attached hereby and marked A’.

13. In its response to the petition, the State opposed the annulment of the seizure and demolition order arguing that: **“Steps will be taken during the demolition to minimize the chances that significant harm will be caused to apartments adjacent to the terrorist’s apartment, as there is no intention to damage additional apartments in the building, only the apartment in which the terrorist resides with his nuclear family”** (Paragraph 45 of the State’s Response).
14. In the judgment rejecting the petition, the Supreme Court noted: **“As to the execution of the demolition orders: we noted before us the State's undertaking, in both of the cases, that "during the demolition, measures will be taken to minimize the possibility that significant damage would be caused to the apartments adjacent to the terrorist's apartment" (paragraph 45 of the State's response in HCJ 8066/14; paragraph 45 of the State's response in HCJ 8070/14). We will add that like its undertaking before us in HCJ 8025/14, the State should do all it can to minimize the possibility that significant damage will be caused to adjacent apartments. In addition, the respondent would act wisely if he reviewed the engineering opinions submitted by the petitioners on this issue in both cases, and employed them to the extent required”**.

A copy of the judgment is attached hereby and marked B’.

The Event that Caused the Damage

15. On October 6, 2015, the Respondent’s security forces demolished Abu Jamal’s apartment.
16. The demolition was executed negligently and in absolute contradiction to the State’s commitment which had received the force of a judgment by the Supreme Court and undertook as afore stated, *inter alia*, to avoid causing damage to neighboring apartments (HCJ 8066/14 **Abu Jamal et. al v. the GOC Home Front Command**).
17. Due to the demolition of Abu Jamal’s apartment, severe damage was caused to the other apartments in the building **in a manner that constitutes immediate and tangible danger to all the occupants of the building.**

18. Thus, for instance, the apartment of Plaintiff , M Abu Jamal (hereinafter: “M “), the eastern apartment that shares a common wall with the demolished apartment was seriously damaged as follows:
 1. The inner walls of the apartment were destroyed or collapsed or were cracked as a result of the explosion.
 2. The apartment was structurally damaged and both deep damage and cracks appeared in the walls and on the roof.
 3. **Part of the stone coating was dislodged from the walls. Some fell and another part is about to fall constituting an immediate danger to the occupants of the building.**
 4. The apartment’s furnishings and all of its contents were destroyed.
 5. **It should be noted that the apartment has become uninhabitable and must be destroyed and rebuilt. Muawiya and his family, numbering five persons, have become homeless and now live in a room in his parents’ apartment.**
19. Destruction, numerous cracks and damage to contents were caused to the other apartments.
20. **G ’s apartment that was demolished by explosives did not completely collapse. The demolition of the apartment, which was, as aforementioned, a part of a building that was built in the conventional manner according to the continuous static scheme destabilized the constructive balance of the entire structure, particularly the adjacent apartment where Muawiya lives, and created an overload which puts the other parts of the building in danger of collapse. Supporting pillars collapsed during the demolition and, as a result, the entire roof tilts downward and may collapse at any moment. The deep cracks visible in B ’s apartment reveal the severity of the damage.**
21. **Under the current circumstances, parts of Muawiya’s and apartment and/or the wreckage in Abu Jamal’s seized apartment, and Muawiya’s apartment, pose a clear, immediate and tangible danger as they may collapse and, therefore, constitute a hazard that substantially and tangibly endangers the building’s residents and other parts of the structure.**

Photographs illustrating the damage and danger are attached hereby and marked C’.

The engineer’s confirmation of the tangible and immediate dangers caused by the demolition is attached hereby and marked D’.

22. **Due to the above described method of construction, and the immediate dangers, the rubble must be safely carefully removed as quickly as possible.**

It should be noted at this point that the winter weather exacerbates the damage caused by the demolition, the cracks created on the floor of the upper story and the walls of the rest of the building cause severe leaks in the other apartments.

23. It must be noted that an engineer on behalf of the Plaintiffs went to the building on October 7, 2015, documented the damage, and studied the dangers that had been created.

The Appeal to the Respondents and the Exhaustion of Remedies:

24. On October 25, 2015, an appeal was sent to the Respondents and the State Attorney's Office in which the severe hazard was reported. It was requested that the Respondents immediately see to the removal of the severe hazard and act to prevent further harm to life and property.

In the appeal it was also stated that **“Due to the severe and immediate danger, I hereby inform you that if the hazard is not removed within 3 days, my clients will be forced to take any legal action available to them and/or steps to remove it themselves, in as much as this will be financially feasible, without this infringing on their right to demand full compensation for the damage they suffered.**

Additionally, and without detracting from the gravity of your actions, we demand that you find alternative housing for my clients, families numbering scores of people, who are forced to continue to reside in the building despite the many dangers, due to the lack of alternatives and the absence of financial capability that would enable them to find alternative housing. We hold you responsible for all damage that will be caused to life or property as a result of the failure to remove the hazard”.

A copy of the appeal is attached hereby and marked E’.

The undersigned called to verify the receipt of the appeal by Respondent 1 and was told that the matter had been transferred to the care of Ms. Chen Shemlo from the office of the Command's legal advisor, and when the undersigned asked to speak with her she was told that because this is a military system it is not possible to forward telephone calls, and was asked to leave a message and told that someone will call her back.

On October 26, 2015, an appeal was sent by fax to Ms. Shemlo which also remained unanswered.

A copy of the appeal is attached hereby and marked F’.

25. As no response was received, the undersigned, on October 27, 2015, spoke with Mr. Binyamin Schneidel from the office of the Home Front Command's legal advisor who informed her that the appeal was received and that responses were requested from the relevant parties, including an engineer on behalf of Respondent 1, and that after receiving the responses, they will reply to the appeal.

In response to Mr. Schneidel's request, photos documenting the damage and the dangers were sent to him by e-mail.

Later, after providing contact particulars, he asked that the undersigned remain in contact with Chen Shemlo, the deputy legal advisor of the Home Front Command, who is handling the matter.

26. The undersigned again sent her appeal of October 25, 2015, and also many photographs, by e-mail, to Ms. Shemlo who in an e-mail dated October 28, 2015, confirmed receiving the appeal stating that she transferred the matter to the relevant parties for their treatment and that their reply will be sent as soon as possible.

The confirmation is hereby attached and marked G’.

At the same time, the undersigned spoke with Attorney Elad of the State Attorney’s Office who represented the state in the court case on the petition, and she stated that the matter was transferred to the office of the legal advisor of the Home Front Command and that they are meant to reply to the appeal.

27. The undersigned repeatedly attempted to contact Ms. Chen Shemlo by telephone, but did not receive a reply. In view of this fact, and that fear of danger to human life, an additional appeal was sent on October 28, 2015 in which the undersigned again emphasized the substantial dangers involved and stated that the Plaintiffs are willing to remove the rubble themselves. For this purpose, she asked to receive an authorization to remove the rubble from the seized apartment. This appeal also remained unanswered.

A copy of the appeal is attached hereby and marked H’.

28. Having no alternative, the undersigned, on October 28, 2015, contacted Mr. Schneidel by telephone and he informed her that an engineer on behalf of the Home Front Command has not yet visited the area that he cannot tell her when the engineer will do so, and that it is possible that there will be a delay due to the current security situation.
29. On October 29, 2015, an additional appeal was sent to the Respondents and to the legal advisor of the Home Front Command in which the undersigned emphasized that the Respondents’ conduct lacks good faith, that it is motivated by extraneous considerations, and that it constitutes contempt for human life.

The appeal stated that “until now I have not received a substantive response to all of my appeals despite the concrete dangers hovering over my clients and their neighbors. Yesterday I was amazed to hear that the engineer on behalf of the Home Front Command has still not visited the area. Even worse, you were unable to give me a definite response as to when he will visit the site. Despite the urgency of the matter, you tried to excuse this unreasonable delay by the current security circumstances. It must be noted that this claim is a mockery, as engineers on behalf of the Command take measurements of houses designated for seizure in Jerusalem and the Territories every day without any difficulty. Additionally the situation in Jerusalem has calmed down, and in any event, the demolition of the apartment was executed at the height of the current wave, demonstrating that the security situation does not affect and/or is not meant to affect the engineer’s visit to the site and cannot serve as an excuse for the delay in the treatment of the matter. The conduct of the Home Front Command, and their refrain from giving an authorization

to my clients to remove the hazard themselves, is most grave and constitutes contempt for human life. I would be grateful to receive your response without delay”.

A copy of the appeal is attached hereby and marked I’.

30. **To date, no reply has been given and hence the urgent need to appeal to this honorable court. It should be noted that the request is being submitted prior to the submission of a petition. The petition will be filed within 7 days.**
31. **The Plaintiffs’ petition will include a demand for a permanent mandatory injunction and a compensation claim for the damage caused the Plaintiffs by the demolition.**

Considerations for Granting the Temporary Order:

32. When a motion for a temporary remedy is submitted, the court must examine the existence of two principal cumulative conditions. The existence of an **alleged right**, that is verified by means of an examination of the prospects of the principal petition, and the existence of a **justification for granting a remedy prior to the deliberation of the petition itself**, that is examined by means of the “ balance of convenience” (Regulation 362 of the Civil Law Procedure Regulations, 5744-1984).
33. There exists between the conditions “**an interrelationship known as “parallel forces”, that is if the court is impressed that the party requesting the remedy has a high chance of winning its lawsuit, it will ease the balance of convenience requirements demanded of it; and vice versa...Nonetheless, it is clear that both the alleged right and the balance of convenience must meet a minimal threshold, as otherwise there will be no justification for granting a temporary remedy**” (LCA 706/09 Meuhedet Health Fund v. the Jerusalem Surgical Center, March 10, 2009).
34. Secondary questions that assist the court in making its decision relate to the behavior of the parties, their good faith, the date the motion was submitted to the court, whether it is tainted by delay, the manner in which the motion was submitted to the court and its integrity, and whether granting a temporary remedy is justified and proportionate in consideration of all of the circumstances of the matter. In the words of the secondary legislator – the court must examine “**whether the request was submitted in good faith and whether granting the remedy is justified and appropriate under the circumstances, and does not cause harm beyond what is required**”. (Regulation 362 (b)).
35. These tests are relevant, in general, not just to a temporary restraining order but also to a temporary mandatory injunction. In should be recalled this context that “**the one who alters the existing situation is not necessarily the appellant who seeks a temporary remedy against the defendant...the scrutiny must be more comprehensive. The one who alters or may modify the existing situation is, in fact, the defendant, and the appellant is the one who seeks a**

remedy against this change” (Dudi Schwartz, Temporary Remedies – Guidelines for Exercising Judicial Discretion, **Legal Studies**, 13 441 (1996).

36. It should also be recalled that **the court has broad discretion as to when to grant a restraining order or a permanent or temporary mandatory injunction, and it must examine a wide range of considerations when deciding whether to accept the request to issue an order or not.**
37. The examination, therefore, is never formal and cannot be completely dependent on technical questions such as whether the matter concerns the final remedy sought in the petition, or whether it involves a financial remedy that can be delayed until the conclusion of the proceedings. Therefore, even if, in general, the balance of the considerations specified above does not justify granting a temporary order involving a financial obligation (Permission to Appeal 707/08 **Hagai Ben Aharon et. Al v. the Israel Police** of February 12, 2009), this is not a rule that is appropriate to all cases, and at times issuing an order involving finances at the end of a procedure is not an adequate and satisfactory alternative to immediate remedy.

The Existence of an Alleged Right – the Prospects of the Petition:

38. In accordance with Regulation 362(a) of the Civil Law Procedure Regulations, a party requesting a temporary remedy must demonstrate, through ostensibly reliable evidence, that there is justification for the claim. Thus, and in accordance with case law, the party requesting the temporary order must show there is an apparent chance that its claim will be accepted, although the necessary degree of persuasion is lesser than the degree required for a final decision of the case.
39. Regarding this matter see for example: LCA 5095/93 **P. A. Arben Ltd. v. Gaby A.G.R. Partners for Construction and Development** IsrSc 49(1) 730, 737 and CA 483/85 **Daniel Lev v. Degam Systems Ltd.** IsrSc 39(4) 729.
40. In order to prove the existence of a right to receive the temporary remedy, the appellant must prove that he is ostensibly entitled to receive the order. This does not refer to proof of the appellant’s claims in the principal petition, but to an examination by the court of whether the appellant’s claim is not groundless and devoid of any prospect of succeeding. The statement of the Honorable President Olshen In CA 277/68 **Sami Shehadeh Nasser v. Ahmed Ali Khouri**, IsrSc 16 2669, page 2671, opposite the letter g’, is appropriate to this matter as follows:

“The considerations that guide the Court in matters such as this do not only concern the estimated harm that may be caused to the appellant. The Court also considers the right of an appellant to a judicial decision regarding his claim, and failure to reach out to help an appellant means preventing the court from carrying out its judicial work by creating new facts. This is more so when the claim is not, seemingly, groundless and is not without prospects”.

41. The Plaintiffs' request has justifiable grounds both pursuant to the Land Law and according to the Civil Wrongs Ordinance, and also in light of the undertaking of the State to the High Court of Justice. A detailed petition will be submitted later on. The Plaintiffs have raised arguments based on an anchored right. They, hence, certainly and all the more so, allegedly have a right to receive the temporary mandatory injunction as requested:
- a. The evidentiary infrastructure that was presented reveals a concrete and immediate danger that suffers no delay.
 - b. The Respondents are the wrongdoers who created the above described dangers.
 - c. By virtue of their seizure of the apartment, the Respondents forbid the Plaintiffs from making any changes in it.
 - d. The Respondents are acting in bad faith and out of extraneous motives when they do not remove the rubble and/or do not grant the Plaintiffs authorization to do so themselves. The Respondents refuse, without any plausible explanation, to allow the Plaintiffs to remove the rubble of the seized apartment and/or are delaying their reply.
 - e. The Respondents' actions were carried out negligently and in violation of the explicit undertaking they themselves gave to the highest court.
 - f. Today, and in light of the order of seizure and forfeiture, the Respondents' legal status is akin to that of property holders and as such the obligations imposed on property holders to take all necessary actions to prevent damage to adjacent properties and/or to make reasonable use of the property and to avoid causing damage to nearby properties apply to them.
 - g. Concurrently, the Plaintiffs, as holders of properties to which a danger is posed from a nearby property have the right to take all necessary actions in order to prevent the danger from reaching them including entry into nearby properties and the execution of vital actions to reduce the damage and the danger, in the absence of an appropriate response by the holder of the neighboring property.
 - h. All of these establish cause for a claim by the Plaintiffs that is, at the very least, theoretical, and their alleged entitlement to the requested remedies is certain.
 - i. The Respondents, in their conduct, breach their obligations under the law and their explicit undertaking to the High Court of Justice. Consequently, they are endangering the lives of the Plaintiffs for no fault of their own.

The Balance of Convenience:

42. In deciding whether to accept the request for a temporary remedy, the Honorable Court will weigh the balance of convenience between the damage that will be caused to the Plaintiffs if the remedy they requested is not granted to them, and the damage to the Respondents if the injunction is granted.
43. In our matter, a decision of the Honorable Court to refrain from granting temporary relief to the Plaintiffs will, in practice, lead to the endangerment of human life and to a further deterioration of the Plaintiffs' economic situation which was worsened by the events that are the subject of the motion. With respect to the last, the Plaintiffs will clarify that many of them were laid off from their jobs, unlawfully and through no fault of their own, following the event due to which Ghassan's home was demolished.

44. In light of the above, the Plaintiffs must show that the damage that will be caused to them should it be decided not to grant the temporary injunction, exceeds the damage that will be caused to the Respondent should the injunction be granted.

45. **The words of the Honorable Judge Lubovsky in his book, Law Procedure in the Labor Court 5758 - 1998, page 273, are appropriate to this matter as follows:**

“The balance of convenience between the damage that will be caused to the Plaintiff should the court refuse to grant a temporary order and the damage to the Respondent should the order is granted is an important consideration which the court must take into account prior to deciding whether to grant the temporary remedy or not.”

46. In regard to our matter, the balance of convenience inclines significantly and clearly in favor of the Plaintiffs, as the damage that will be caused to them - severe harm to life and property - should the injunction not be granted is far greater than the damage, if any, that will be caused to the Respondents should the injunction be granted.

47. As aforesaid, the Plaintiffs will argue that no damage whatsoever will be caused to the Respondents should the injunction be granted as they will only reduce the Plaintiffs' damage and will also, literally, save human life. It must be emphasized that the act of demolition, and its deterrence purposes, will not be disrupted in any way whatsoever by the prevention of a tangible and real damage to innocent persons who have no link to the actions for which the demolition was executed.

48. The Plaintiffs will further argue that there is no element of delay in their conduct, in consideration of their repeated appeals to the Respondents, and their warning of the severe harm that may be caused to both the residents and the houses that are the subject of this motion.

49. This Court is vested with the material and geographic jurisdiction to deliberate the Plaintiffs' request in light of the grounds, location of the properties, and the remedies requested.

Conclusion:

50. There is no dispute that the teeth of ate sour grapes and have, therefore been set on edge. In light of the Respondents' actions during the demolition, and especially afterwards, we fear that they may wish the teeth of the fathers, brothers and neighbors to also be set on edge.

The spirit of the Late Justice Cheshin hovers over us and reminds us of his reverberating words when he addressed a similar issue in H CJ 2006/97 **Ghanimat et. Al v. OC Central Command Maj.-Gen. Uzi Dayan** a generation ago asserting:

Since the establishment of the state – certainly since the Basic Law: Human Dignity and Liberty – when we have read Regulation 119 of the Defense Regulations, we have read it and vested it with our values, the values of the free and democratic Jewish state. These values guided us on the path of justice during our people’s glory days of old and our own times are no different: “They shall say no more the fathers have eaten sour grapes, and the children’s teeth are set on edge. Every man that eats sour grapes, his teeth shall be set on edge.”

May the memory of Justice Cheshin live on.

51. In light of the aforesaid, the Honorable Court is requested to issue a temporary injunction ordering the Respondents as stated in the preface of this motion.

52. The Court is also requested to rule that the Respondents bear the Plaintiffs’ expenses in this procedure and the payment of attorney fees including VAT.

Ghada Hliehel – Yassin, Adv.
Counsel for the Plaintiffs