

1-108. Muhammad Musa Shehadeh Abu Ar'am et 107 al.

109 The Association for Civil Rights in Israel

Represented by counsel, Adv. Dan Yakir and/or Roni Pelli et al.

The Association for Civil Rights in Israel

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Petitioners in HCJ 413/13

110-252. Mahmoud Yunis et 142 al.

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Petitioners in HCJ 1039/13

v.

1. Minister of Defense

2. IDF Commander in the Judea and Samaria Area

Represented by the State Attorney's Office

29 Salah a-Din St, POB 49029, Jerusalem

Tel: 02-6466194, Fax: 02-6467011

The Respondents

Application for Leave to Submit Document

1. The Honorable Court is hereby moved to grant the Petitioners leave to submit a document that was kept in the IDF Archives and obtained by counsel for the Petitioners in recent days.
2. The document in question is a letter from Military Advocate General (hereinafter: MAG) Meir Shamgar (the document is signed by Maj. David Kos on behalf of the MAG), dated July 11, 1967. It was sent to several officials in the Central Command and concerns military training zones in the West Bank.
3. In this letter, the MAG notes that land cannot be declared a training zone unless it is uninhabited and uncultivated.
4. Counsel for the Petitioners maintain that this document supports their argument that the declaration of the firing zone was made illegally and that it contradicts international law.
5. Due to the poor quality of the scanned document, and for the sake of convenience, both the original document and a clearly typed copy of its content are hereby enclosed.
6. Adv. Bert, counsel for the Respondents relays that he leaves the motion for the discretion of the court.

Today, September 15, 2016

[signed]

Adv. Dan Yakir
Counsel for the Petitioners
HCJ 413/13

[signed]

Adv. Shlomo Lecker
Counsel for the Petitioners
HCJ 1039/13