VIA HAND DELIVERY

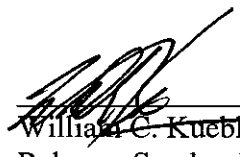
October 31, 2007

Mark J. Langer, Clerk
United States Court of Appeals for
the District of Columbia Circuit
E. Barrett Prettyman United States Courthouse
333 Constitution Avenue, NW
Washington, DC 20001

Dear Mr. Langer,

Enclosed for filing please find an original and four copies of Petitioner's Response to Respondent's Motion to Dismiss Petition for Review for Lack of Jurisdiction. Thank you for your attention to this matter.

Sincerely,



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Enclosures
cc: Service List

NOT YET SCHEDULED FOR ORAL ARGUMENT

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

OMAR AHMED KHADR, Petitioner, v. UNITED STATES and UNITED STATES COURT OF MILITARY COMMISSION REVIEW, Respondents.	No. 07-1405 CMCR Docket No. 07-001

PETITIONER'S RESPONSE TO RESPONDENT'S MOTION TO DISMISS PETITION FOR REVIEW FOR LACK OF JURISDICTION

Pursuant to Rule 27 of the Circuit Rules of the United States Court of Appeals for the District of Columbia Circuit, Petitioner Omar Khadr ("Petitioner") hereby responds to the Government's motion to dismiss his petition for review for lack of jurisdiction. Petitioner is a Canadian citizen currently detained at the United States detention facility at Guantánamo Bay, Cuba. He is one of only three detainees currently facing trial before a military commission. On June 4, 2007, the military judge in Petitioner's case dismissed all charges against Petitioner. On September 24, 2007, the Court of Military Commission Review ("CMCR") reversed the military judge's dismissal in part and remanded for further proceedings.

The next day, the Government personally served on Petitioner a copy of the CMCR's decision, together with a Memorandum advising him that, under the Rules for Military Commission, he had the "right to petition the United States Court of Appeals for the District of

Columbia Circuit within 20 days of the date of this notification." Department of Defense, Memorandum for Omar Ahmed Khadr (Sept. 25, 2007) (attached hereto as Ex. A) (internal quotation marks omitted). The Memorandum further directed Petitioner that "[t]he petition must be filed directly with the United States Court of Appeals for the District of Columbia Circuit." *Id.* To confirm that Petitioner was aware of his rights, the Affidavit of Service in the Memorandum certified that at the time the Memorandum was served on Petitioner, he was "advised of his right to petition the United States Court of Appeals for the District of Columbia Circuit." *Id.*

On October 9, 2007, in full compliance with the procedures set forth in this Memorandum, Rules 908, 1201, and 1205 of the Rules for Military Commission ("RMC"), Regulations 25 and 26 of the Regulation for Trial by Military Commissions ("Reg"), and Section 950g of the Military Commissions Act of 2006 ("MCA"), 10 U.S.C. § 950g, Petitioner filed a Petition for Review in this Court, seeking review of the CMCR's decision reversing in part the military judge's dismissal of charges against him, and of two related orders issued by the CMCR. *See* Petition for Review, *Khadr v. United States, et al.*, No. 07-1405 at 1-2 (D.C. Cir. filed Oct. 9, 2007) ("Petition").

Now, in an abrupt and unexplained about-face, the Government has filed this motion to dismiss, asserting that this Court lacks jurisdiction to hear Petitioner's appeal. That position flatly contradicts the Government's notice to Petitioner advising him of his right to petition this Court from the CMCR's decision. It is also wrong. The MCA provides this Court with exclusive jurisdiction to determine the validity of ***any*** final judgment issued by a military commission—this Court's jurisdiction is not limited, as the Government contends, to review of those final judgments that follow a full military commission trial. Because the military judge's

June 4, 2007 Order dismissing all charges against Petitioner was a "final judgment," and because all appeals under the MCA have been exhausted, this Court's jurisdiction is properly invoked. Alternatively, even if the military judge's June 4 order did not constitute a "final judgment" sufficient to support jurisdiction under the MCA, that order, as modified by the CMCR's September 24, 2007 order, is immediately appealable under the collateral order doctrine. The Government's motion should be denied.

ARGUMENT

I. UNDER THE PLAIN LANGUAGE OF THE MCA, THIS COURT HAS JURISDICTION TO "DETERMINE THE VALIDITY" OF THE MILITARY JUDGE'S FINAL JUDGMENT OF JUNE 4, 2007

The plain language of the MCA provides that this Court shall have "exclusive jurisdiction to determine the validity of a final judgment rendered by a military commission," so long as "all other appeals under [the MCA] have been waived or exhausted." 10 U.S.C. § 950g. Both of the prerequisites for appellate jurisdiction under this section have been met. The military judge's June 4, 2007 order dismissing all charges against Petitioner was a "final judgment" because it "'end[ed] the litigation on the merits and [left] nothing for the court to do but execute the judgment'"—*i.e.*, dismiss Petitioner's case for lack of jurisdiction. *Budinich v. Becton Dickinson & Co.*, 486 U.S. 196, 199 (1988) (quoting *Catlin v. United States*, 324 U.S. 229, 233 (1945)). And, because the Government chose to appeal this judgment to the CMCR under Section 950d of the MCA, all appeals under the MCA have been "exhausted." Accordingly, the statutory requirements for jurisdiction have been satisfied, and this Court has jurisdiction to hear Petitioner's appeal.

This straightforward understanding of the statutory scheme is confirmed not simply by the Government's notice to Petitioner, which (as discussed) expressly advised Petitioner of his

"right" to file a petition for review with this Court in this case, but also by the Government's own Rules and Regulations, which repeatedly note that an accused may petition for review in this Court after the CMCR has decided any appeal. *See* RMC 908(c)(3) ("[a]fter the [CMCR] has decided ***any*** appeal . . . the accused may petition for review by the United States Court of Appeals for the District of Columbia Circuit") (emphasis added); RMC 1205 ("[t]he accused may petition for review of the decision of the [CMCR] if such petition is filed within 20 days from the time the accused was in fact notified of the decision of the [CMCR]"); Reg. 25-9(a) ("[a] copy of each CMCR decision (opinion or order disposing of an appeal or petition) must be served" on the accused); Reg. 25-9(e)(1) (service of CMCR decisions must be accompanied by a form for petitioning this Court and a postage paid envelope addressed to this Court); Reg. 26-1; *see generally* Petition at 5 & Exs. D, F, G.[1]

This understanding of the statute is also consistent with long-standing practice under the procedures for trial by court-martial set forth in the Uniform Code of Military Justice

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[1] Contrary to the Government's contentions, *see* Gov't Motion to Dismiss ("Gov't Br.") at 8, Rule 908(c)(3) does not simply specify "when" an accused may bring an appeal, without indicating any position on this Court's jurisdiction to hear such an appeal. That Rule, by its plain terms, implies that an accused has a right to have an appeal heard in this Court—an understanding that is confirmed by the other rules and regulations cited in the text. It would make no sense for the rules and regulations to set forth requirements that the Government inform an accused of appeal rights, establish a time limit for filing a petition for review, and inform the accused that the petition must be filed directly with this Court, if this Court did not have jurisdiction to hear such an appeal. The rules and regulations—and the Memorandum the Government sent to Petitioner advising him of his right to file *the very petition for review at issue here*—plainly contemplate that this Court will have jurisdiction to hear Petitioner's appeal.

These rules, moreover, were promulgated under Section 949a of the MCA, which gives the Secretary of Defense authority to prescribe "[p]retrial, trial and post-trial procedures . . . for cases triable by military commission," 10 U.S.C. § 949a(a), and were presumably reported to Congress as required by the MCA, *see* 10 U.S.C. § 948a note ("Submittal of Procedures to Congress"). Congress' silence in response suggests that Congress views these Rules, including the Rules providing for post-trial review by the D.C. Circuit following "any" decision by the CMCR, as a reasonable interpretation of the statute by the Secretary of Defense. Because the decision of the military judge is reviewable as a final judgment or under the collateral order doctrine, this Court need not decide whether the Secretary's interpretation of his authority under Section 949a is entitled to any degree of weight or deference. *Cf. United States v. Mead Corp.*, 533 U.S. 218 (2001); *Chevron U.S.A., Inc. v. NRDC, Inc.*, 467 U.S. 837 (1984).

("UCMJ")—the procedures upon which the military commission procedures are expressly based. *See* 10 U.S.C. § 948b(c). Like the UCMJ, the MCA gives the United States a right to appeal to a military appellate court from a military judge's "order or ruling" that "terminates proceedings . . . with respect to a charge or specification." *Compare* U.C.M.J. art. 62 ("the United States may appeal [to the Court of Criminal Appeals] an order or ruling of the military judge which terminates the proceedings with respect to a charge or specifications or which excludes evidence that is substantial proof of a fact material in the proceeding"), *with* 10 U.S.C. § 950d(a) (the United States "may take an interlocutory appeal to the [CMCR] of any order or ruling of the military judge that—(A) terminates proceedings of the military commission with respect to a charge or specification; (B) excludes evidence that is substantial proof of a fact material in the proceeding"). It was this provision of the MCA that the Government invoked in seeking CMCR review of the military judge's June 4 order in Petitioner's case. *See United States v. Khadr*, CMCR 07-001 at 3 (Sept. 24, 2007).

Under the UCMJ, if the Government prevails in such an appeal, the defendant then has a right to appeal to the Court of Appeals for the Armed Forces. *See* Rule for Courts-Martial 908(c)(3), Manual for Court-Martial, United States (2005 ed.) ("After the Court of Criminal Appeals has decided any appeal under Article 62, the accused may petition for review by the Court of Appeals for the Armed Forces."). Given Congress's express intent to emulate the process followed by courts-martial, *see* 10 U.S.C. § 948b(c), these UCMJ procedures provide powerful evidence that Petitioner's reading of the Section 950g of the MCA (and the Government's own reading, prior to this motion) is correct, and that a detainee is entitled to appeal after an adverse decision by the CMCR. *See, e.g., Cannon v. Univ. of Chicago.*, 441 U.S. 677, 698-99 (1979) ("It is always appropriate to assume that our elected representatives, like

other citizens, know the law; in this case, because of their repeated references to Title VI and its modes of enforcement, we are especially justified in presuming both that those representatives were aware of the prior interpretation of Title VI and that that interpretation reflects their intent with respect to Title IX.").

The Government raises four arguments against this straightforward reading of the statute. All of them fail. First, the Government contends that "[t]here is no 'final judgment' for this Court to review," because "[t]he CMCR has simply remanded the case to the military commission for further proceedings." Gov't Br. at 6. That argument is a red herring. Section 950g of the MCA does ***not*** require a "final judgment" from the CMCR before this Court can exercise its powers of review. Rather, it expressly states that this court shall have jurisdiction "to determine the validity of a final judgment rendered ***by a military commission***." 10 U.S.C. § 950g(a)(1)(A). The status of the CMCR's remand order is thus irrelevant to this Court's appellate jurisdiction under the MCA.

The Government next argues that "[t]he military judge's June 4, 2007 ruling is not a final judgment," because "it was reversed by the CMCR," and because "the military commission proceedings are still pending." Gov't. Br. at 7; *see also id.* at 7-8 n.7. But the military judge's June 4 order falls squarely within the definition of a "final judgment," because (as noted above) it "'end[ed] the litigation on the merits and [left] nothing for the [military judge] to do but execute the judgment'" by dismissing the charges against Petitioner without prejudice. *Budinich v. Becton Dickinson & Co.*, 486 U.S. 196, 199 (1988) (quoting *Catlin v. United States*, 324 U.S. 229, 233 (1945)); *see also Tootle v. Sec'y of the Navy,* 446 F.3d 167, 172 (D.C. Cir. 2006). The CMCR's subsequent reversal does not render the military judge's June 4 order any less a "final judgment," and the Government cites no authority to suggest that it does. The fact that military

commission proceedings are now pending similarly fails to change the fact that the military judge's June 4 order was a "final judgment." Indeed, the Military Commission Rules and Regulations expressly contemplate that military commission proceedings may be ongoing while an accused is pursuing appellate review in this Court. *See* Reg. 25-10(a) ("Further proceedings in CMCR cases need not be delayed, however, solely to permit an accused to petition USCADCC . . . ."); RMC 908(c)(3) ("If the decision by the [CMCR] permits it, the military commission trial may proceed as to the affected charges and specifications pending further review by the United States Court of Appeals for the District of Columbia Circuit, unless either court orders the proceedings stayed."). These provisions would make no sense if the mere pendency of military commission proceedings could render a "final judgment" unappealable.[2]

The Government next argues that because the military judge's June 4 order was a decision in Petitioner's favor, his Petition violates the principle that prevailing parties lack standing to appeal. *See* Gov't Br. at 8. That argument too fails. Initially, there is no statutory basis for the Government's argument. Unlike many statutes conferring appellate jurisdiction, the MCA is not phrased in terms of appeal "from" a final decision by a lower court. *See, e.g.*, 28

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[2] The Government also suggests that the June 4 order was not final because it was not approved by the convening authority. *See* Gov't. Br. at 6. That is incorrect. The convening authority reviews only the "findings and sentence" of a military commission. *See* 10 U.S.C. § 950b. Because the military judge in Petitioner's case dismissed the charges for lack of jurisdiction before making any finding of guilt or innocence or pronouncing a sentence, the convening authority's review is not implicated in Petitioner's case. Contrary to the Government's assertion, the approval of the convening authority is not a prerequisite to appellate jurisdiction under the MCA. The reference to the convening authority in Section 950g ("the [D.C. Circuit] shall have exclusive jurisdiction to determine the validity of a final judgment rendered by a military commission (as approved by the convening authority) under this chapter") means only that when a military commission makes a "finding[]" of guilt or innocence and issues a "sentence," those findings and that sentence must be approved by the convening authority pursuant to Section 950b of the MCA, 10 U.S.C. § 950b, before they may be appealed. Where, as here, a military commission's "final judgment" does ***not*** involve "findings" or a "sentence," no such approval is required. Indeed, the use of the term "final judgment" in Section 950g indicates that that Section permits appeal from a broader group of rulings than those which the convening authority may approve under § 950b. *See* 10 U.S.C. § 950b (giving the convening authority the power to modify only the "findings and sentence" of a military commission).

U.S.C. § 1291. Instead, the MCA gives this Court jurisdiction to "determine the validity" of a judgment rendered by a military commission so long as two prerequisites are satisfied: the military commission's judgment must be final; and all other appeals must be exhausted. 10 U.S.C. § 950g(a)(1). As discussed above, those prerequisites have been satisfied, and Petitioner is seeking, under the plain language of the statute, to have this Court "determine the validity" of the military judge's June 4 order. The MCA does not impose any ***additional*** requirement that the military commission judgment whose validity is to be determined be adverse to Petitioner.

Nor is there any dispute that Petitioner is a non-prevailing party with standing to pursue this appeal. The CMCR decision was plainly adverse to Petitioner. Thus, while "[a] party who receives all [the relief] that he has sought" is not generally permitted to appeal, that rule is inapplicable here, because the CMCR has ruled against Petitioner, and he therefore retains a meaningful "stake in the appeal" sufficient to satisfy the standing requirements of Article III. *See Deposit Guaranty Nat'l Bank v. Roper*, 445 U.S. 326, 334 (1980). The cases the Government cites to suggest that Petitioner is a "prevailing party" actually support Petitioner's claim that he is entitled to appeal. Those cases make clear that the prohibition on appeals by prevailing parties is designed to prevent those parties from appealing simply to challenge the reasoning of the court's opinion. *See, e.g., Sea-Land Serv. v. DOT*, 137 F.3d 640, 648 (D.C. Cir. 1998) (noting that "courts 'review[] judgments, not statements in opinions'") (quoting *California v. Rooney*, 483 U.S. 307, 311 (1987)). Here, Petitioner is seeking not a change in reasoning, but a change in outcome. The CMCR determined that the military judge's jurisdictional ruling was, in relevant part, incorrect; Petitioner disagrees, and seeks to have this Court "determine" that, contrary to the CMCR, the military judge's June 4 dismissal of the charges against Petitioner was "valid[]" in its entirety. 10 U.S.C. § 950g.

II. THE MILITARY JUDGE'S JUNE 4 ORDER, AS MODIFIED BY THE CMCR'S SEPTEMBER 24 DECISION, IS IMMEDIATELY APPEALABLE UNDER THE COLLATERAL ORDER DOCTRINE

In any event, even if this Court should agree with the Government that there has been no "final judgment" in Petitioner's case supporting review, the military commission's June 4 order, as modified by the CMCR's September 24, 2007 decision, is subject to immediate appeal under the collateral order doctrine. Under that doctrine, a non-final order is nonetheless subject to review if it "[1] conclusively determine[s] the disputed question, [2] resolve[s] an important issue completely separate from the merits of the action, and [3] [is] effectively unreviewable on appeal from a final judgment." *Coopers & Lybrand v. Livesay,* 437 U.S. 463, 468 (1978).

In his June 4 decision, the military judge determined that the Combatant Status Review Tribunal's ("CSRT's") determination that Petitioner's was an "enemy combatant" was insufficient to confer jurisdiction on the military commission to try Petitioner, because the offenses alleged only applied to "alien *unlawful* enemy combatant[s]." *See* June 2007 Military Commission Order on Jurisdiction (attached to Petition as Ex. E). The military judge further found that he was not a proper authority to make an "unlawful" enemy combatant determination. *Id.* In its September 24, 2007 order, the CMCR agreed with the military judge's first conclusion, but disagreed with his second, concluding that he could in fact independently determine whether Petitioner was an "unlawful" enemy combatant. *See* CMCR Opinion of the Court and Action on Appeal by the United States at 8-9, 18 (attached to Petition as Ex. A).

The CMCR's decision that the military judge is empowered to receive evidence and assess Petitioner's status as an "unlawful enemy combatant" satisfies all three elements of the collateral order doctrine. The first two requirements are easily met. The CMCR decision conclusively determines an important question—whether the military judge himself has the

authority to assess Petitioner's status, or whether (as the military judge concluded) that determination must be made by an independent entity such as a CSRT. And that question is distinct from the merits of the military commission proceeding: it is prior to, and unrelated to, the question of Petitioner's guilt or innocence on the charges alleged.

The third *Coopers* requirement is also satisfied here. Petitioner has a right not to be tried for war crimes by a tribunal that has no legitimate jurisdiction over him; and trial before such a tribunal is not an injury that can be redressed on appeal. *See Hamdan v. Rumsfeld*, 415 F.3d 33, 36 (D.C. Cir. 2005), *rev'd on other grounds*, 126 S. Ct. 2749, 2753 (2006) ("[S]etting aside the judgment after trial and conviction insufficiently redresses the defendant's right not to be tried by a tribunal that has no jurisdiction."); *see also Hicks v. Bush*, 397 F. Supp. 2d 36, 42 (D.D.C. 2005) ("[P]roceedings which ultimately may be determined to be unlawful cannot be 'undone.'"); *Hamdan v. Rumsfeld*, 126 S. Ct. at 2772-73 ("[Petitioner] and the Government both have a compelling interest in knowing in advance whether [Petitioner] may be tried by a military commission that arguably is without any basis in law and operates free from many of the procedural rules prescribed by Congress for courts-martial—rules intended to safeguard the accused and ensure the reliability of any conviction.").

In addition—and importantly—the public has a strong interest in ensuring the legitimacy and legality of military commission jurisdiction prior to Petitioner's trial. *See Hicks v. Bush*, 397 F. Supp. 2d at 43 ("It is in the public interest to have a final decision, leaving no doubts as to [a] key jurisdictional issue, before Petitioner's military commission proceedings begin."). This is a particularly important consideration, because (as the Supreme Court has explained), in evaluating the third *Coopers* factor, "[i]t is not mere avoidance of a trial but avoidance of a trial *that would imperil a substantial public interest*, that counts when asking whether an order is

effectively unreviewable if review is to be left until later." *Will v. Hallock*, 546 U.S. 345, 353 (2006) (emphasis added) (quotations omitted).

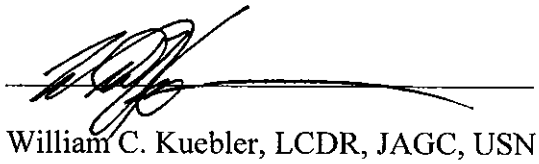
As both the military judge and the CMCR agreed, Petitioner's status as an "enemy unlawful combatant" is crucial to the military commission's jurisdiction to try him for the crimes alleged. And as the military judge overseeing Petitioner's trial recognized, there are serious doubts about the propriety of trying Petitioner for war crimes without a prior CSRT determination that he is in fact an "enemy unlawful combatant." *See* June 2007 Military Commission Order on Jurisdiction (attached to Petition as Ex. E). As Petitioner argued, and as the military judge also recognized, both U.S. and international law require that the determination of Petitioner's status as an "unlawful" enemy combatant be made by an entity *other* than the one that tries him for the crimes alleged. *See id.* As a result, if the CMCR's order is not reviewed now, Petitioner could proceed to trial and sentencing before a military commission, only to have this Court subsequently hold that the military commissioner lacked the authority to declare Petitioner an "unlawful" enemy combatant, and therefore that Petitioner's entire trial had been conducted before a body that lacked jurisdiction. This injury to Petitioner and to the public's confidence in the military commission process could not be remedied after the fact. The military judge's June 4 order, as modified by the CMCR's September 24 order, therefore satisfies the requirements of the collateral order doctrine and should be reviewed now.

CONCLUSION

For the foregoing reasons, the Government's motion to dismiss for lack of jurisdiction should be denied.

Dated: October 31, 2007

Respectfully Submitted,



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**Admitted to practice outside of the District of Columbia;*
Supervised by principals of the firm.

CERTIFICATE OF SERVICE

I certify that on October 31 2007, two true copies of Petitioner's Response to Respondent's Motion to Dismiss Petition for Review for Lack of Jurisdiction were sent, via Federal Express, to:

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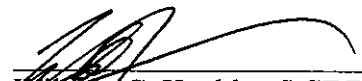

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A

DEPARTMENT OF DEFENSE
OFFICE OF MILITARY COMMISSIONS
1600 DEFENSE PENTAGON
WASHINGTON, DC 20301-1600

Date: 25SEP07

MEMORANDUM FOR Omar Ahmed Khadr, 0766, Guantanamo Bay, Cuba

SUBJECT: Service of decision and orders of the Court of Military Commission Review in the Case of United States v. Omar Ahmed Khadr, a/k/a "Akhbar Farhad", a/k/a "Akhbar Farnad," a/k/a "Ahmed Muhammed Khali"

You are hereby served with a copy of the decision and orders of the Court of Military Commission Review on 25 SEP 07, pursuant to Chapter 25 of the Regulation for Trial by Military Commissions and the Rules for Military Commission. A copy of the decision and the orders have been provided to your detailed defense counsel.

You are advised that Rules for Military Commission 908 and 1201 provide a "right to petition the United States Court of Appeals for the District of Columbia Circuit" within 20 days of the date of this notification. The petition must be filed directly with the United States Court of Appeals for the District of Columbia Circuit.

You are further advised that the Court of Military Commission Review may reconsider its decision in any case upon motion filed by either the detailed appellate defense counsel within five days after receipt by counsel of a decision or order, or by the detailed appellate government counsel within five days after the decision or order is received by counsel.

AFFIDAVIT OF SERVICE AND NOTIFICATION OF RIGHTS

I hereby certify that a copy of the decision and orders of the Court of Military Commission Review were served on Omar Ahmed Khadr this 25th day of September 2007. At the time of service, the accused was advised of his right to petition the United States Court of Appeals for the District of Columbia Circuit discussed above and provided a copy of this memorandum.

Michelle A. Hansen O4
Typed/Printed Name/Grade

Signature

JTF-GTMO/SJA
Organization

APO AE 09360
Address of Organization