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**At the Beer Sheva District Court**  
**Sitting as the Court for Administrative Affairs**

**PP 36242-04-13**  
Scheduled for Sept. 10, 2013  
Before the Honorable Judge Persky

In the matter of: \_\_\_\_\_ **'Abbasi**

Represented by Counsel, Adv. Daniel Shenhar et al.

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 Petitioner**

v.

**Israel Prison Service**

Represented by Counsel, Advocate from the Southern District of the  
Israeli Prison Service

**The Respondent**

### **Amendment of the above captioned Petition**

According to the decision of the honorable court dated July 7, 2013, the petitioner hereby respectfully amends his petition as follows:

1. This petition concerns petitioner's request of the honorable court to direct the respondent to allow his father, Mr. \_\_\_\_\_ 'Abbasi, and his brother, Mr. \_\_\_\_\_ 'Abbasi, to enter the incarceration facilities under his responsibility to visit him.
2. As noted by us, in our application for leave to file an updating notice dated July 4, 2013, subsequent to the filing of the above captioned petition, in April 2013, the respondent has also started to prohibit the entry of petitioner's two year old son, \_\_\_\_\_, to visits in prison. The reason which was given: the son is not registered in his father's identification card.

3. This is the place to emphasize that the son was born **after** his father was arrested, and therefore he has not been registered in his father's identification card (the Ministry of the Interior imposes difficulties on Palestinian prisoners, residents of East Jerusalem, in the registration of their children who were born after their father's imprisonment). It should be noted that the birth certificate which was issued when the son was born, specifically states that the child is petitioner's son.
4. It should be further pointed out that until recently, the respondent allowed the son \_\_\_\_\_ to visit his father in prison, when his escorts brought with them the above mentioned birth certificate.
5. In view of all of the above, on May 21, 2013 the undersigned wrote to the commander of Ktziot prison, where the petitioner is held, and requested that the respondent would continue to permit the entry of petitioner's young son into prison, to visit him. The birth certificate and a former entry permit into prison which was given to the son by the respondent were attached to the request.

A copy of the request dated May 21, 2013, with its enclosures, is attached and marked **P/9**.

6. No response to said request has been received in respondent's [*sic*] offices until this day.
7. In view of the fact that the request was disregarded as specified above, the petitioner himself checked the matter *vis-à-vis* the responsible officials in prison, and was told that they were adamant not to let the baby into prison. Furthermore, they have even told the petitioner that since he preferred to file petitions against the respondent, he should also solve this problem in court(!).
8. It is clear that said violation of the most fundamental rights of the petitioner, as specified in the legal part of the petition, may not be overlooked. **Hence, the application to amend the petition, and in view of the decision of the honorable court, this notice of amendment, in which the petitioner requests to add to the original remedy which was requested in the petition, an additional remedy: that the honorable court directs the respondent to allow his young son \_\_\_\_\_ to enter prison to visit him.**

Jerusalem, July 21, 2013

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Daniel Shenhar, Adv.  
Counsel to the Petitioner

(File No. 66642)

