

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

MOHAMAD E. TAHA (Deceased) and
 SANAA M. YASSIN, his wife
Pro Se Petitioners

V.

THE UNITES STATES OF AMERICA
 Respondent

MOTION FOR *PRO SE* REPRESENTATION

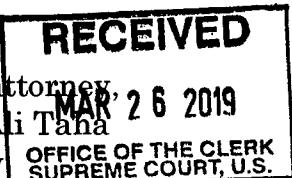
As advised by this Court's office of the clerk's supervisor, *Pro Se* Petitioners, Mr. Mohamad E. Taha (deceased) and his wife Sanaa M. Yassin, respond to this Honorable Court's return of their Petition for Writ of Certiorari, filed on March 1, 2019. The Petition was returned with letter dated March 5, 2019, resubmitted with letter dated March 11, 2019, returned again with letter dated March 14, 2019, and resubmitted again under this Motion. The Court alleged the reason for the return of the Petition was that *Pro Se* Petitioners' representation by the undersigned family member and assigned power of attorney, Ali M. Taha, was not admitted to practice before this Court as provided in Rule 5, Rule 9.

Pursuant to Rule 5 and Rule 9, there are exceptions. An attorney seeking to file a document in this Court in a representative capacity must first be admitted to practice before this Court, "except that admission to the Bar of this Court is not required under... or under any other applicable federal statute."

Pro Se Petitioners' representation is in accordance with Rules 5 and 9 under the "applicable federal statute" to have representative capacity by the undersigned, Ali Taha. The federal statute, specifically Rule 83.1, is therefore, applicable to their representation in this Court. The following courts and other government agencies have accepted Ali Taha's representation.

1. The Court of Appeals accepted that:

"Ali Taha is Mr. Mohamad E. Taha's brother, has a power of attorney, and has assisted appellants in this case since its outset. Mr. Ali Taha also indicates in his petition that Ms. Yassin cannot effectively represent herself "because of language barrier and deficiency in communications" and that the appellants cannot afford to hire an attorney... Under the unique circumstances of this case, the court will accept motion for leave to proceed *in forma pauperis*, a reply brief, and joint appendix filed by appellants with the assistance of Mr. Ali Taha.



Accordingly, IT IS ORDERED THAT: the motion is granted to the extent provided herein. Doc. 20, dated 07/31/2018.”

2. The United States (Respondent), recognized and accepted that:

“Mr. Ali Taha is not an attorney; however, he is the brother of Mr. Taha. Rule 83.1 provides that an “an individual who is not an attorney may represent oneself or a member of one’s immediate family...” Because Mr. Ali Taha is the brother-in-law of Mrs. Yassin, we do not contest that Mr. Ali Taha can represent Mrs. Yassin. Doc. 12 dated January 30, 2018.”

3. The Court of Federal Claims’ acknowledgement and acceptance that:

“Ali M. Taha, *pro se*, Bradenton, FL, on behalf of Mohamad Taha, deceased, and Sanaa Yassin, *pro se*, United Arab Emirates. Plaintiffs... acting through Ali M. Taha, designated as a power of attorney, bring this suit against the United States for a tax refund... Rule 83.1(a)(3) of the United States Court of Federal Claims provides that “[a]n individual who is not an attorney may represent oneself or a member of once’s immediate family.” The government does not contest Mr. Ali M. Taha’s representation of Mr. Mohamad Taha and Ms. Yassin as one holding their power of attorney.” Doc. 20 dated April 10, 2018.”

4. The District Court of Florida’s acknowledgement and acceptance of Ali M. Taha’s representation of Plaintiffs. Doc. 12 dated June 13, 2017.
5. The Department of Treasury, Internal Revenue Service, authorized Ali Taha to act or receive information on behalf of the taxpayer, as power of attorney with assigned Centralized Authorization File (CAF) number 0311-0540R dated December 10, 2014.
6. The State of California acknowledgement and acceptance of Ali Taha, as power of attorney, representing Petitioners by processing and refunding their claim for tax refund, similar to this claim.

Ms. Yassin’s residency in the U.A.E., forced upon her and her children by withdrawal of her US residency by the US consulate, and her limited language efficiency as acknowledged by the court of appeals, will prevent her from signing any part of their claim. As such, Ali Taha will continue his representation of Petitioners.

Ali Taha is extremely knowledgeable of this case since its outset in year 2007. He filed the case on behalf of *Pro Se* Petitioners and argued it with evidence with all the above U.S. government entities since 2007. He is educated and holds a master degree in engineering with over 35 years of experience in engineering design and construction management.

Based on all the above acknowledgements and acceptances of Ali Taha's representation of *Pro Se* petitioners, in accordance with Rule 5, Rule 9 and Rule 83.1, Petitioners respectfully request that this Honorable Court accept Ali Taha's representation with full authority in this executed Petition, including the executed Motion for Leave to Proceed *in Forma Pauperis*, on their behalf with no corrections necessary to be made to the returned submission of the Petition for a Writ of Certiorari, and no further returns.

This Petition will not require personal or oral arguments in this Court in any form.

Dated March 22, 2019



Ali M. Taha
Power of Attorney for
Pro Se Petitioners

**Additional material
from this filing is
available in the
Clerk's Office.**