

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

JESÚS CABRERA JARAMILLO, *et al.*

Plaintiffs,

v.

CARLOS MARIO JIMENEZ NARANJO,

Defendant.

CASE NO. 10-cv-21951-TORRES

**DEFENDANT'S RESPONSES AND OBJECTIONS
TO PLAINTIFFS' SECOND REQUEST FOR ADMISSIONS**

To: Jane Doe and John Doe, plaintiffs
C/o: Luke Liss, Esq.
Wilson Sonsini Goodrich & Rosati
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050

From: Carlos Mario Jimenez Naranjo, defendant
C/o: Maria A. Dominguez, Esq.
McConnell Valdés LLC
P.O. Box 364225
San Juan, PR 00918

Pursuant to Federal Rule of Civil Procedure 26(e), defendant Carlos Mario Jimenez Naranjo ("Defendant") hereby responds to Plaintiffs' Second Request for Admissions, without waiving any rights, arguments, or defenses, as follows:

I. GENERAL OBJECTIONS AND RESERVATION OF RIGHTS

1. Defendant objects to Plaintiffs' Discovery Requests to the extent they deviate from or purport to impose requirements other than or in addition to those required by the Federal Rules of Civil Procedure, the Local Civil Rules of the Southern District of Florida, and/or the orders of this Court.

2. Defendant objects to Plaintiffs' Discovery Requests to the extent they seek information or documents outside the scope of discovery permissible under the Federal Rules of Civil Procedure.

3. Defendant objects to Plaintiffs' Discovery Requests to the extent that they seek information or documents protected by the Attorney-Client Privilege, the Attorney Work Product Doctrine, or any other applicable privilege or immunity. None of these responses is intended as, or should be construed as a waiver or relinquishment of any part of the protections afforded by the Attorney-Client Privilege, the Attorney Work Product Doctrine, or any other applicable privilege or immunity.

4. Defendant objects to Plaintiffs' Discovery Requests to the extent that they seek information or documents that are beyond his custody, possession, or control and/or seek information that is equally available to Plaintiffs.

5. Defendant objects to Plaintiffs' Discovery Requests to the extent they seek information or documents for any period of time beyond any applicable statute of limitations.

6. Defendant objects to Plaintiffs' Discovery Requests because they contain undefined terms which make them vague, ambiguous, overbroad, unduly burdensome, and oppressive.

7. Defendant expressly limits its responses to Plaintiffs' Discovery Requests to the information or documents that can be located after a reasonable and diligent search, within the short period allowed, of its records believed most likely to contain the responsive information.

8. Defendant's investigation into the facts alleged in Plaintiffs' Second Amended Complaint is ongoing, and he continues to search for information or documents responsive to Plaintiffs' Discovery Requests. As additional information or documents become available, Defendant reserves the right to amend, modify, clarify and/or supplement its responses and objections as appropriate.

9. Defendant's decision to provide information or documents notwithstanding the objectionable nature of Plaintiffs' Discovery Requests is not to be construed as an admission that the information or document is relevant, as a waiver of the general or specific objections, or as an agreement that future requests for similar discovery will be treated in a similar manner.

10. These General Objections and Limitations apply to each of Plaintiffs' Discovery Requests as though restated in full in response thereto. To the extent Defendant asserts objections to individual requests, those objections shall apply equally to any subparts of the request.

II. RESPONSES TO REQUESTS FOR ADMISSION

Response to Request for Admission No. 6

Denied as drafted. Defendant admits he was the commander of the BCB; however, regional commanders were responsible for the day-to-day affairs of the AUC's fronts, each of which had political, military, and financial autonomy.

Response to Request for Admission No. 7

Denied. Hector Duque Ceballos, a/k/a Monoteto, was the BCB's Disciplinary Inspector.

Response to Request for Admission No. 8

Denied as drafted. Defendant admits he was the commander of the BCB; however, regional commanders were responsible for the day-to-day affairs of the AUC's fronts, each of which was responsible for the payroll of its members.

Response to Request for Admission No. 9

Admitted, in part. Defendant admits that he had authority over the lower-ranking members of the BCB. However, Defendant had no authority or input in the day-to-day affairs of the individual fronts that composed the BCB.

Response to Request for Admission No. 10

Admitted only to the extent that Defendant communicated occasionally with these individuals.

Defendant admits nothing as to the content of said communications.

Response to Request for Admission No. 11

Denied.

Response to Request for Admission No. 12

Denied.

Response to Request for Admission No. 13

Denied.

Response to Request for Admission No. 14

Denied.

Response to Request for Admission No. 15

Admitted only to the extent that Defendant interacted occasionally with these individuals in-passing. Defendant admits nothing as to the content of said communications.

Response to Request for Admission No. 16

Admitted only to the extent that Defendant interacted occasionally with these individuals in-passing. Defendant admits nothing as to the content of said communications.

Response to Request for Admission No. 17

Denied as drafted.

Response to Request for Admission No. 18

Denied as drafted. Defendant admits that men under his command were engaged in armed conflict against the FARC, and other guerrilla groups, but denies that he ever ordered any murders.

Response to Request for Admission No. 19

Denied as drafted. Defendant admits that men under his command were engaged in armed conflict against the FARC, and other guerrilla groups, but denies any violence was in defense of any drug-trafficking operations.

Response to Request for Admission No. 20

Denied as drafted. The BCB was located in South Bolivar, near Middle Magdalena but outside of Middle Magdalena.

Response to Request for Admission No. 21

Admitted.

Response to Request for Admission No. 22

Denied. There were several groups in the area.

Response to Request for Admission No. 23

Admitted.

Response to Request for Admission No. 24

Denied due to lack of knowledge. Defendant is unaware of the precise location of each of the BCB's fronts at that time.

Response to Request for Admission No. 25

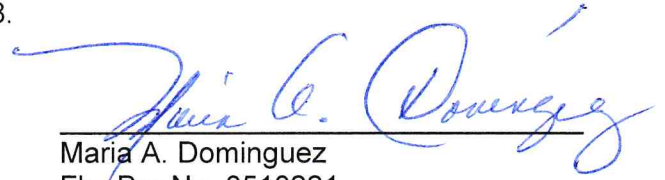
Denied due to lack of knowledge. Defendant is unaware of the precise location of each of the BCB's fronts at that time.

Response to Request for Admission No. 26

Denied.

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In Miami, Florida, this 18^h day of April 2018.




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UNSWORN STATEMENT UNDER PENALTY OF PERJURY

I, Carlos Mario Jimenez Naranjo, do hereby declare under penalty of perjury:

1. My name is as stated above, I am of legal age, married, and currently under the custody of the U.S. Government in Miami, Florida.
2. I have reviewed the Responses and Objections to Plaintiffs' First Request for Admissions, and the responses asserted therein are true and correct based on my personal knowledge.
3. I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge and recollection.

On this 18th day of January, 2018.

 01-18-18
