

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

CATHLEEN COLVIN, individually and as parent and next friend of minors C.A.C. and L.A.C., heirs-at-law and beneficiaries of the estate of MARIE COLVIN, and JUSTINE ARAYA-COLVIN, heir-at-law and beneficiary of the estate of MARIE COLVIN, c/o Center for Justice & Accountability, One Hallidie Plaza, Suite 406, San Francisco, CA 94102

Plaintiffs,

v.

SYRIAN ARAB REPUBLIC,
c/o Foreign Minister Walid al-Mualem
Ministry of Foreign Affairs
Kafar Soussa, Damascus, Syria

Defendant.

Civil No. _____

Complaint For
Extrajudicial Killing,
28 U.S.C. § 1605A

OFFER TO ARBITRATE

1. ***Offer to Arbitrate:*** Pursuant to the provisions of 28 United States Code § 1605A(a)(2)(A)(iii), Plaintiffs Cathleen Colvin, as the parent and next friend of minors C.A.C. and L.A.C., heirs-at-law and beneficiaries of the estate of Marie Colvin, and Justine Araya-Colvin, as an heir-at-law and beneficiary of the estate of Marie Colvin, hereby offer to submit the claims asserted in the above-captioned matter to arbitration in accordance with accepted international rules of arbitration. Plaintiffs propose to negotiate the scope, terms, and place of arbitration with Defendant the SYRIAN ARAB REPUBLIC, and invite Defendant to contact them at the earliest possible date (but in any event no later than the date on which Defendant

would otherwise be required to file an answer or response to the above-captioned matter) to discuss such matters and conclude a binding agreement to arbitrate.

2. ***Potential Place and Rules of Arbitration:*** Plaintiffs are amenable to conducting the arbitration in The Hague, Netherlands, pursuant to the Permanent Court of Arbitration's Arbitration Rules of 2012 ("PCA Arbitration Rules 2012"), subject to such modifications as the Parties may agree in writing (including modifications necessary to provide for public access to such proceedings), or pursuant to other mutually accepted international rules of arbitration.

3. ***Potential Supplemental Claims or Claimants:*** Provided Defendant is amenable, Plaintiffs further propose to supplement any arbitration proceeding by including international legal claims asserted by Plaintiffs, Paul Conroy, Wael al-Omar, or Adnan al-Hamid arising from events related to those alleged in the above-captioned litigation.

4. ***Severability and Non-Conditionality:*** For avoidance of doubt, Plaintiffs' proposals to conduct the arbitration in The Hague, Netherlands, pursuant to the PCA Arbitration Rules 2012 and to supplement any arbitration proceeding with additional claims and claimants are separate and distinct from the offer to arbitrate the claims brought in the above-captioned litigation. Therefore, Defendant's acceptance of these additional proposals is in no way a condition of Plaintiffs' offer to arbitrate the claims brought in the above-captioned litigation.

Dated: July 9, 2016

/s/ Scott A. Gilmore

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