

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

CATHLEEN COLVIN *et al.*,

*Plaintiffs,*

v.

SYRIAN ARAB REPUBLIC,

*Defendant.*

Civil No. 1:16-CV-01423 (ABJ)

**PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT**

Plaintiffs in the above-captioned matter, by and through their undersigned counsel, respectfully make this Motion for Default Judgment against Defendant Syrian Arab Republic, pursuant to the Court's Minute Order entered on October 26, 2017. Plaintiffs submit the following evidence in support of this Motion:

- Declaration of Cathleen Colvin, dated March 17, 2018, and Exhibits A to C thereto;
- Declaration of Justine Araya-Colvin, dated March 17, 2018;
- Declaration of Christopher Araya-Colvin, dated March 16, 2018;
- Declaration of "Ulysses," dated September 28, 2017, and Exhibits A to D thereto;
- Declaration of Paul Conroy, dated October 24, 2017, and Exhibits A to C thereto;
- Declaration of Wael Fayez al-Omar, dated September 19, 2017, and Exhibits A to C thereto;
- Declaration of Abdelmalek Nouar a.k.a. Anwar Malek, dated July 19, 2017;
- Declaration of Abdel Majid Mohammed Abdel Majid Barakat, dated December 22, 2017, and Exhibit A thereto;

- Declaration of “John Doe,” dated September 25, 2017, and Exhibits A to E thereto;
- Declaration of Adnan al-Hamid a.k.a. Khaled Abu Salah, dated October 1, 2017, and Exhibits A to E thereto;
- Declaration of John Witherow, dated March 16, 2018, and Exhibit A thereto;
- Declaration of Javier Antonio Espinosa Robles, dated August 17, 2017, and Exhibit A thereto;
- Expert Report of Dr. Maria Tsennykh, dated March 20, 2018;
- Expert Report of U.N. Special Rapporteur David Kaye, dated March 15, 2018, and Exhibits 1 to 13 thereto;
- Expert Report of Ambassador Robert Stephen Ford, dated March 17, 2018, and Exhibits 1 to 15 thereto;
- Expert Report of Ewan Brown, dated March 2, 2018, and Exhibits A to C thereto; and
- Exhibits A to C to this Motion, with certifications of custodians.

The grounds for this Motion are set forth in the accompanying Memorandum of Law.

Dated: March 22, 2018

Respectfully submitted,

/s/ Scott A. Gilmore

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