

**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)

DECLARATION OF JUSTINE ARAYA-COLVIN

I, Justine Araya-Colvin, declare as follows:

1. Marie Colvin was my aunt – the eldest sister of my mother, Cathleen Colvin. My two brothers and I are beneficiaries of her estate.

2. I am a U.S. citizen over 18 years of age. I am currently a sophomore at Stanford University studying biology and pursuing research in infectious disease, with plans to attend medical school. I have personal knowledge of the facts set forth in this declaration, unless stated otherwise.

3. I was only thirteen when Aunt Marie was killed by a rocket launched by the Syrian government. I found out from a television screen: Mom switched on the news after receiving a call, and then we watched them report that my aunt was dead in some faraway country where she had been reporting on a war I wasn't old enough to fully understand. It was completely surreal. It didn't feel like it was actually happening.

4. When I was little, I thought that Aunt Marie was a superhero. She was this engaging, dynamic person, who would swoop in for visits, armed with stories and belly laughs and extravagant presents. And then she would disappear to do what I knew even then was really

important work of reporting on wars and other tragedies around the world. She told me she had to tell the stories of people who were hurting and who were otherwise forgotten. My mom told us stories about her all the time which made it okay that I wouldn't see her for long periods of time. She was the kind of person I wanted to be. She was invincible. She could – and did – do anything she put her mind to.

5. Aunt Marie was the world's best storyteller. She would transfix me and my brothers at bedtime, telling us stories of danger and daring and adventure. She was dashing, sporting a roguish black eye patch for as long as I can remember. It was only after Aunt Marie died that I understood how devastating it was for her to lose vision in her eye. At the time, Mom got eye patches for us kids as well, to keep up with Aunt Marie's trendsetting fashion. It was just a game to me at three-years-old. I never got to hear from Aunt Marie the struggles she went through, how it had happened, and how she managed to make it out the other side.

6. When I was six, Mom and I flew to London to visit Aunt Marie. I had always had a special relationship with her, but it was cemented as we romped around London, leaving Mom behind to ride horses in the park and visit my first rocky beach, and buying so many purple-colored clothes (my favorite color at the time) that I needed a new suitcase to get home. Mom was horrified at the price tags on the boots, beaded dresses, and feather boas that no kid required. She insisted that we return them. So, naturally, Aunt Marie led me on a giddy, whooping run around her house, tearing up receipts and hiding them behind couch cushions so that we couldn't take back a thing. It is still one of my favorite memories of her: she was so alive, so captivating in her headlong embrace of life's joys, so infectious in her enthusiasm and courage to do the things she loved. She always told me if I found something I loved, I had to get it, to do it, no matter the cost. It was only once I was older that Mom explained to me that we had gone to visit

Aunt Marie because she was struggling with the trauma of her many deployments and the hardship of losing sight in one eye. I hadn't grasped the gravity of her work or the toll it could take on her well enough to have asked her about it myself before she died. Instead, I have to Google my dead aunt to learn what she thought. It turns my stomach to do it. And it makes me angry: I should be able to learn all of this by talking to her, and now I cannot.



Photo of me taken with Aunt Marie in her London home

7. The last time I saw Aunt Marie was Thanksgiving of 2010. I remember being upset that she wouldn't be around for Christmas and then the holidays the next year, but we spoke often on the phone. She would always ask me about my life: my schoolwork, my friends, my clothes. In retrospect, it was so one-sided. I wish I had been old enough to ask her more about where she was and the stories she was writing, because even though my aunt never treated

me as just a kid, I *was* just a kid. Accustomed to the fact that she was using a satellite phone to call me, in the middle of an Arab Spring demonstration, or wherever her story happened to be, I didn't grasp how amazing it was that I could talk to her at all until after she was gone. For most of the time I was able to spend with her, I did not have the capacity to ask about or to understand so many things. Now, I will never get to have those conversations with her, to really know her, to have her know me and how much strength and passion and drive she instilled in me.

8. After we saw the broadcast saying that Aunt Marie had been killed, we got in the car. Mom, my brothers, and I had been skiing in Vermont, so it was a long drive to my grandmother's house in Long Island, where my mom and Aunt Marie had grown up. I remember that when we drove up, the street was filled with waiting reporters and the rest of our family was already there.

9. The funeral was really hard. It was difficult to share this private moment of grief with so many, but it also made me realize how important Aunt Marie had been to people. I remember the Sri Lankans in particular: they were at the funeral; they sent us a beautiful portrait of Aunt Marie, as well as other gifts. More than ten years after she first reported on the civil war in their country, they were still grateful to my aunt. There were many people from the Syrian community as well. I've found myself thinking now that I am older and know more about Aunt Marie's commitment to telling stories that were otherwise lost to the cacophonies of war, that in so many ways her work as a journalist remained true to her undergraduate major in anthropology: she saw narratives where people saw statistics; she wanted humanity to be remembered, to be heard.

10. For me, the reality of Aunt Marie's death hits in waves. For a long time, it was easy to fall into moments when I would think that Aunt Marie was still invincible and helping

the world and would swoop in for one of her visits soon. Even now I still find myself wanting to tell her about what I'm doing with my life and the person I've become; and then a new wave of realization and grief comes over me. At the time, I felt stalked by television screens showing images of the bombed-out building, maybe with Aunt Marie's body crushed underneath. I remember catching a glimpse of her photo on the news while at gym for practice or a game somewhere and then struggling to breathe in the bathroom while the pain hit again.

11. I can hardly read news about Syria even now without feeling overwhelmingly frustrated and angry. Aunt Marie's death should have sparked change the way she was able to spark it when she was alive. It should have inspired people to take action the way she's inspired me my entire life. Instead, nothing has changed.

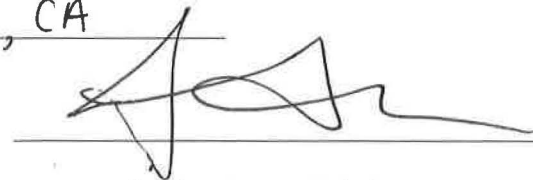
12. Mom tried not to show her reaction to us. I was only thirteen. Chris had just turned twelve and felt things so incredibly strongly; L was ten. But I think Mom was – is – devastated. She tries hard to hide it from us, to protect us both from our own pain and hers. But Aunt Marie raised her. Their dad died when Mom was little and Grandma was left with five kids on a teacher's salary. Aunt Marie became a parent as much as a sibling, I think. Sometimes, when I catch Mom in unguarded moments, and she seems heartbreakingly sad, she'll say "I'm just missing Aunt Marie today." I think, like me, it hits her over and over again in unexpected ways. And it's hard to imagine that it will ever stop.

13. I still catch myself wanting to call Aunt Marie sometimes. I want her to know who I am. I want her to know about Stanford and about my plans to become a doctor and to travel several months every year to countries with limited access to medical care and help those who can't help themselves. I think Aunt Marie would have liked that. I often wonder who she would be now. She always taught us (her nieces, in particular), to be daring; taught me to seize

on my dreams and never to quibble about what I loved. But she'll never know that I'm trying to be like her in that way. I hate that I'll never get to travel with her, that we never went sailing together. There should have been so many trips over college breaks (or, knowing her, playing hooky for some grand adventure). Each big moment of my life I find myself wishing I could tell her about it, to know what she would have thought. And I never will.

I declare under penalty of perjury that the foregoing is true and correct to the best of my recollection.

Executed on March 17, 2018 in Stanford, CA

A handwritten signature in black ink, appearing to read 'Justine Araya-Colvin', written over a horizontal line.

Justine Araya-Colvin