

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

OBADA MZAIK,

Plaintiff,

v.

SYRIAN ARAB REPUBLIC,

Defendant.

Case No. 1:22-cv-00042-ACR

Complaint For Torture,
28 U.S.C. § 1605A

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff in the above-captioned matter, by and through their undersigned counsel, respectfully makes this Motion for Default Judgment against Defendant Syrian Arab Republic.

Plaintiff submits the following evidence in support of this Motion:

- Declaration of Obada Mzaik, dated November 27, 2024;
- Declaration of “Bulldozer Driver”, dated April 8, 2024;
- Declaration of “Gravedigger”, dated April 9, 2024;
- Declaration of Mazen Darwish, dated November 29, 2024;
- Declaration of Mahmoud Hamoud, dated March 4, 2024, and Exhibits A to G thereto;
- Declaration of Yaman Al-Qadri, dated November 21, 2024;
- Declaration of Hanadi Zahlout, dated May 17, 2024;
- Declaration of Mohammad Munir Al-Fakir, dated May 16, 2024;
- Declaration of Mohammed Ali Ibrahim Al-Najjar, dated May 14, 2024;
- Declaration of Abdullah Hamid Al-Abdullah, dated June 5, 2024;
- Declaration of Safouh Muhammad Halema, dated May 27, 2024;

- Declaration of Saber Suleiman Hamada, dated May 27, 2024;
- Declaration of Samir Muhiddin Al-Saadi, dated October 9, 2024;
- Declaration of Hassan Ahsoon, dated October 16, 2024;
- Declaration of “SCM-SLP-CJA-AFI-MB-T-011”, dated October 7, 2024;
- Declaration of Mohamed Osama Nassar, dated October 7, 2024;
- Declaration of Osama Sawan, dated October 8, 2024;
- Declaration of Ahmad Quraitem, dated October 5, 2024;
- Declaration of Ahmad Mohammad Salim Buqai, dated May 15, 2024;
- Declaration of Ahmad Abu Al-Kas, dated October 8, 2024;
- Declaration of Ahmad Maatouq, dated October 13, 2024;
- Declaration of Firas Al-Barjas, dated October 7, 2024;
- Declaration of Kamal Fares, dated October 10, 2024;
- Declaration of “SCM-SLP-CJA-AFI-MB-T-020”, dated May 16, 2024;
- Declaration of Raghda Awad, dated October 9, 2024;
- Declaration of Taymaa Muhiddin, dated October 4, 2024;
- Declaration of “SCM-SLP-CJA-AFI-MB-T-023”, dated October 9, 2024;
- Declaration of Ibrahim Al-Sheikh Hussein, dated October 25, 2024;
- Declaration of “SJAC.W002”, dated June 18, 2024;
- Declaration of “SJAC. W004”, dated July 2, 2024;
- Declaration of “SJAC.W005”, dated October 31, 2024;
- Declaration of “SJAC.W006”, dated October 31, 2024;
- Declaration of Walid Al-Aashban bin Abdullah, dated October 30, 2024;
- Declaration of Osama Natouf bin Ibrahim, dated November 3, 2024;

- Declaration of “SJAC.W009”, dated October 26, 2024;
- Expert Report of Jaber Baker and Uğur Ümit Üngör, dated November 25, 2024, and Exhibits A to C thereto;
- Expert Report of Bernard Duhaime, dated April 16, 2024, and Exhibits A and B thereto;
- Expert Report of Dr. Claudio Grossman, dated December 9, 2024, and Exhibits A and B thereto;
- Expert Report of Dr. Pau Pérez-Sales, dated November 16, 2024, and Exhibits A to C thereto;
- Expert Report of Joumana Seif, dated December 7, 2024, and Exhibits A to C thereto; and
- Exhibit A to the Motion for Default Judgment, U.N. International, Impartial and Independent Mechanism Report on The Syrian Government Detention System as a Tool of Violent Repression, dated December 6, 2024.

The grounds for this Motion are set forth in the accompanying Memorandum of Points and Authorities.

Dated: December 20, 2024

Respectfully submitted,

/s/ Daniel McLaughlin

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