

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

CASE NO: 1:10-cv-21951 Torres

Jesús Cabrera Jaramillo, in his individual)
capacity, and in his capacity as the personal)
representative of the estate of Alma Rosa)
Jaramillo,)
Jane Doe, in her individual capacity, and in her)
capacity as the personal representative of the)
estate of Eduardo Estrada, and)
John Doe, in his individual capacity,)
Plaintiffs,)
v.)
CARLOS MARIO JIMÉNEZ NARANJO, also)
known as “Macaco,” “El Agricultor,” “Lorenzo)
González Quinchía,” and “Javier Montañez,”)
Defendant.)

**DECLARATION OF LEO P. CUNNINGHAM IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANT’S MOTION TO DISMISS FOR LACK OF
PROSECUTION**

I, Leo Cunningham, declare as follows:

1. I am a member of the law firm Wilson Sonsini Goodrich & Rosati, P.C. (“WSGR”), counsel for Plaintiffs Jesús Carbera Jaramillo, Jane Doe, and John Doe (“Plaintiffs”), and I am licensed to practice law by the State of California.

2. I am informed and believe that since June 26, 2012, other WSGR attorneys, our co-counsel at the Center for Justice and Accountability, and I have worked on this matter, *Jaramillo v. Naranjo*, Case No. 1:10-cv-21951, and our work has included the following:

- Prepared multiple discovery documents and conducted related research;

- Conducted research on rules and procedures governing discovery in a foreign country;
- Worked to identify and locate witnesses;
- Conducted research on multiple other legal, factual, and logistical matters.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 19, 2013 in Tokyo, Japan.

/s/ Leo Cunningham
LEO CUNNINGHAM

ATTESTATION

I, Julie Ferguson, am the ECF User whose identification and password are being used to file this Declaration of Leo P. Cunningham In Support of Plaintiffs' Opposition to Defendant's Motion to Dismiss for Lack of Prosecution. I hereby attest that Leo Cunningham has concurred in this filing.

Dated: July 18, 2013

By: /s/ Julie C. Ferguson
Julie C. Ferguson, Florida State Bar #93858
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Declaration of Leo P. Cunningham in Support of Plaintiffs' Opposition to Defendant's Motion to Dismiss for Lack of Prosecution was served by CM/ECF on July 18, 2013, on counsel or parties of record on the service list.

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/s/ Julie C. Ferguson
JULIE C. FERGUSON