

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

**CASE NO: 1:10-cv-21951 Ungaro/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.**

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**DECLARATION OF NEMA MILANINIA IN SUPPORT OF PLAINTIFFS’  
OPPOSITION TO DEFENDANT’S MOTION FOR RECONSIDERATION OF  
COURT’S ORDER ON PLAINTIFFS’ MOTION TO PROCEED ANONYMOUSLY**

I, Nema Milaninia, declare as follows:

1. I am an attorney licensed to practice law before the State of California, and am admitted to practice in the Northern District of California. I am associated with the law firm of Wilson Sonsini Goodrich & Rosati P.C., counsel for Plaintiffs Jesús Cabrera Jaramillo, Jane Doe, and John Doe (“Plaintiffs”).

2. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Department of State, Country Reports on Human Rights for 2010, Colombia, dated April 8, 2011.

3. Attached hereto as Exhibit 2 is a true and correct copy of Deborah Orr, *Slave Chocolate?*, FORBES (April 24, 2006), available at <http://www.forbes.com/forbes/2006/0424/096.html>.

4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion for Leave to Proceed Anonymously and in Opposition to Defendant’s Motion to Dismiss Claims of Anonymous Plaintiffs, *Yousuf, et al., v. Samantar*, No. 1:04-cv-1360 (E.D. Va. Dec. 29, 2004).

5. Attached hereto as Exhibit 4 is a true and correct copy of *Chavez, et al. v. Carranza*, No. 2:03-cv-02932, slip op. (W.D. Tenn. Dec 12, 2003).

6. Attached hereto as Exhibit 5 is a true and correct copy of *Doe v. Bridgestone Corporation, et al.*, No. 2:05-cv-08168, slip op. (C.D. Cal. Nov. 23, 2005).

7. Attached hereto as Exhibit 6 is a true and correct copy of *Doe v. Nestle, S.A.*, No. CV-05-5133-SVW, slip op. (C.D. Cal. Dec. 3, 2010).

8. Attached hereto as Exhibit 7 is a true and correct copy of *Yousuf, et al., v. Samantar*, No. 1:04-cv-1360, slip op. (E.D. Va. Jan. 7, 2005).

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 5, 2011

By: /s/ Nema Milaninia  
NEMA MILANINIA

I, Julie C. Ferguson, am the ECF User whose identification and password are being used to file this Declaration of Nema Milaninia in Support of Plaintiffs' Opposition to Defendant's Motion For Reconsideration of Court's Order on Plaintiffs' Motion to Proceed Anonymously. I hereby attest that Nema Milaninia has concurred in this filing.

Dated: December 5, 2011

By: /s/ Julie C. Ferguson  
Julie C. Ferguson, Florida State Bar #93858  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Declaration of Nema Milaninia in Support of Plaintiffs’ Opposition to Defendant’s Motion for Reconsideration of Court’s Order on Plaintiffs’ Motion to Proceed Anonymously was served through the Court’s CM/ECF System on December 5, 2011, on counsel or parties of record on the service list.

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/s/ Julie C. Ferguson  
JULIE C. FERGUSON