



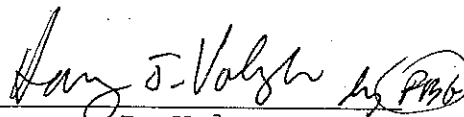
Defendant has continued to communicate with appropriate State Department officials regarding Defendant's request. In particular, on or about February 11, 2005, Defendant's counsel forwarded to the attorney advisor in the State Department with responsibility for managing the State Department's response to defendant's request a copy of a letter dated February 10, 2005, addressed to Secretary of State Condoleezza Rice from the new transitional government of Somalia. The letter formally requested that the Department file with this Court a suggestion of immunity or statement of interest urging this Court to dismiss the claims against Defendant (copy attached as Exhibit 1).

In addition, the following communications have been sent to the State Department: Plaintiffs' opposition to suggestion of immunity or statement of interest (copy attached as Exhibit 2); Plaintiffs' response to petition of the transitional government of Somalia (copy attached as Exhibit 3); Defendant's reply to Plaintiffs' opposition to suggestion of immunity or statement of interest (copy attached as Exhibit 4); letter to attorney advisor in the State Department from the individual styled as the Foreign Minister of the Republic of Somaliland in opposition to suggestion of immunity or statement of interest (copy attached as Exhibit 5); and Defendant's response to the letter from the individual styled as the Foreign Minister of the Republic of Somaliland (copy attached as Exhibit 6).

On March 15, 2005, counsel to Defendant spoke with the attorney advisor in the State Department with responsibility for managing the State Department's response to Defendant's petition in order to ascertain the likely timetable within the State Department for a response. The representative of the State Department indicated that the State Department is "working diligently" on a reply to the request. He noted that the Department has received numerous submissions on the issues and that the Department also has "a lot of case authority to work through." He stated that the matter is an "important" one for the State Department, and "we hope to have a position shortly."

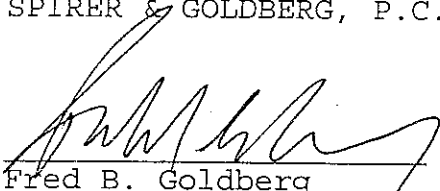
Respectfully submitted,

SHAUGHNESSY, VOLZER & GAGNER



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IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

BASHE ABDI YOUSUF, ET AL. :  
 :  
 Plaintiffs, :  
 : Civil Action No. 1:04 CV 1360  
 v. :  
 :  
 MOHAMED ALI SAMANTAR :  
 :  
 Defendant. :

ORDER

Before the Court are Defendant's Motion for Enlargement of Time to File and Motion for Continuance of the deadline for reporting on the Department of State's position regarding whether the Court should grant defendant immunity. Given the continuing importance of the issues at stake and the reasonableness of defendant's efforts to secure this information in a timely fashion, defendant's Motion for Enlargement of Time to File and Motion for Continuance are GRANTED; and it is hereby

ORDERED that defendant report again to the Court regarding the Department of State's position on defendant's immunity within thirty (30) days of this Order.

The Clerk is directed to forward copies of this Order to counsel of record.

Entered this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

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Leonie M. Brinkema  
United States District Judge

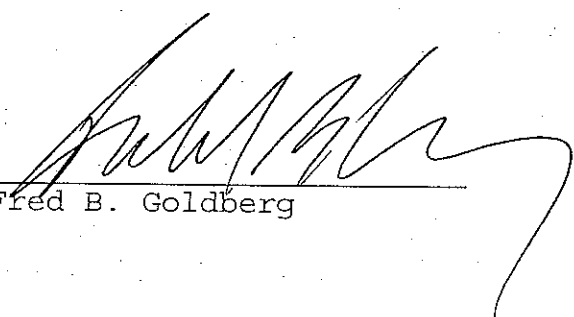
Alexandria, Virginia

CERTIFICATE OF SERVICE

I, Fred B. Goldberg, hereby certify that on this 15<sup>th</sup> day of March, 2005, I caused to be served a true and correct copy of the foregoing Defendant's Motion for Enlargement of Time to File and Motion for Continuance of the Deadline for Reporting on the Position of the Department of State by first-class U.S. Mail, postage pre-paid, as indicated below on the following:

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Fred B. Goldberg