

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

JOHN DOE, in his capacity)
as the executor of the Estate of)
JANE DOE, in his personal capacity,)
and as the personal representative of)
JANE DOE)
)
Plaintiffs,)
)
v.)
)
OSAMA BIN LADEN, et al.,)
)
Defendant.)
_____)

Case No. 01-2516 (RWR)

**AFFIDAVIT REQUESTING ENTRY OF DEFAULT
AGAINST DEFENDANT THE ISLAMIC EMIRATE OF AFGHANISTAN**

I, Paul J. Orfanedes, being duly sworn, hereby depose and say:

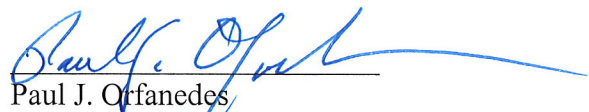
1. I am counsel for Plaintiff in the above-captioned matter.
2. Plaintiff initiated this action on December 4, 2001.
3. According to the return of service affidavit filed by the U.S. State Department on August 20, 2002, Defendant The Islamic Emirate of Afghanistan a/k/a The Islamic State of Afghanistan (hereafter "Afghanistan") was served with a Notice of Suit, Summons, and a copy of the Complaint on July 31, 2002, through diplomatic channels in accordance with the provisions of the Foreign Sovereign Immunities Act. 28 U.S.C. § 1608.
4. Despite having been served in this matter, no appearance has been entered by Afghanistan, no responsive pleading has been filed or served upon counsel for Plaintiff; no motion for extension of time has been filed with or granted by this Court.

5. The time for filing a response to the Complaint has expired. Pursuant to 28 U.S.C. § 1608(d), Afghanistan's response to Plaintiff's Complaint was due on or before September 29, 2002.

6. For all the above reasons, the Clerk is requested to enter a Default against Defendant Afghanistan.

I declare under penalty of perjury, 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on January 24, 2003, in Washington, D.C.



Paul J. Orfanedes
D.C. Bar No. 429716
JUDICIAL WATCH, INC.
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Suite 500
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(202) 646-5199 (Facsimile)
Judicialwatchinc@hotmail.com

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Case No. 01-2516 (RWR)

RULE 55(a) DEFAULT OF DEFENDANT
THE ISLAMIC EMIRATE OF AFGHANISTAN

It appearing that Defendant The Islamic Emirate of Afghanistan, a/k/a The Islamic State of Afghanistan, has failed to plead or otherwise defend this action though duly served with Notice of Suit, Summons, and a copy of the Complaint pursuant to 28 U.S.C. § 1608(a)(4) on July 31, 2002, and an affidavit on behalf of Plaintiff having been filed (Docket Document No. 11), it is this _____ day of _____, 2003, declared that Defendant The Islamic Emirate of Afghanistan is in default.

Nancy M. Mayer-Whittington, Clerk

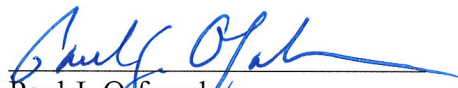
By: _____
Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of Paul J. Orfanedes' Affidavit Requesting Entry of Default of Defendant The Islamic Emirate of Afghanistan to be mailed, postage pre-paid, through the United States Postal Service on January 24, 2003, to the following:

The Honorable Ishaq Shahryar
Ambassador of Afghanistan to the United States
2341 Wyoming Avenue, N.W.
Washington, D.C. 20008

The Honorable Dr. Abdullah
Minister of Foreign Affairs
Ministry of Foreign Affairs
Kabul, Afghanistan


Paul J. Orfanedes