

**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 REPUBLIC OF IRAQ**

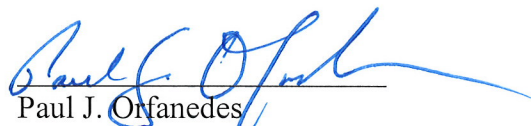
I, Paul J. Orfanedes, being duly sworn, hereby depose and say:

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. Department of State on September 4, 2002, Defendant The Republic of Iraq (“Iraq”) was served with a Notice of Suit, Summons, and a copy of the Complaint on June 17, 2002, in accordance with the Foreign Sovereign Immunities Act. 28 U.S.C. § 1608.
4. Despite having been served in this matter, no appearance has been entered by Iraq, no responsive pleading has been filed or served upon counsel for Plaintiffs; 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), Iraq's response to Plaintiffs' Complaint was due on or before August 18, 2002.

6. For all the above reasons, the Clerk is requested to enter a Default against Defendant The Republic of Iraq.

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  
Washington, D.C. 20024  
(202) 646-5172  
(202) 646-5199 (Facsimile)  
Judicialwatchinc@hotmail.com

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Case No. 01-2516 (RWR)

**RULE 55(a) DEFAULT OF DEFENDANT THE REPUBLIC OF IRAQ**

It appearing that Defendant The Republic of Iraq 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 June 17, 2002, and an affidavit on behalf of Plaintiff having been filed (Docket Document No. 12), it is this \_\_\_\_\_ day of \_\_\_\_\_, 2003, declared that Defendant The Republic of Iraq is in default.

Nancy M. Mayer-Whittington, Clerk

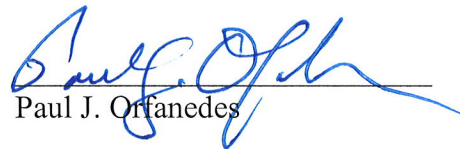
By: \_\_\_\_\_  
Deputy Clerk

**CERTIFICATE OF SERVICE**

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

The Republic of Iraq  
c/o His Excellency Naji Sabri al-Hadithi  
Minister of Foreign Affairs  
Ministry of Foreign Affairs  
Baghdad, Iraq

The Republic of Iraq  
c/o Mr. Akram Alduri  
Chief of the Iraqi Mission  
Embassy of Algeria - Section on Iraq  
1801 P Street, N.W.  
Washington, D.C. 20036

  
Paul J. Orfanedes