

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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H. MAYER-WHITTINGTON  
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U.S. DISTRICT COURT  
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, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
OSAMA BIN LADEN, *et al.*, )  
 )  
Defendants. )  
\_\_\_\_\_ )

Civil Action No.:

**PLAINTIFF'S MOTION FOR LEAVE TO FILE  
ACTION UNDER PSEUDONYM**

Plaintiff John Doe, by counsel, respectfully requests leave to file this action under a pseudonym. As grounds therefor, Plaintiff states as follows:

**MEMORANDUM OF LAW**

1. This action arises from the September 11, 2001 terrorist attacks on the United States, which resulted in the death of Plaintiff's wife. Plaintiff brings this lawsuit in his personal capacity, on behalf of his wife's estate, and as the personal representative of his deceased wife.

2. Named as Defendants in this lawsuit are The Republic of Iraq, the Islamic Emirate of Afghanistan, the Taliban, Al Qaeda, and Osama Bin Laden, known terrorists, terrorist organizations and/or sponsors of terrorism.

3. In order to protect the health, safety, welfare, and privacy interests of Plaintiff and his family, including two teenagers, from both further terrorist attacks and from media harassment, Plaintiff respectfully requests that he be granted leave to file this action under a pseudonym.

Plaintiff particularly fears that he and/or his family members could be subject to further terrorist attacks and/or retaliation for bringing this lawsuit against known terrorists and sponsors of terrorism if his name, address and other identifying information about himself and his family members becomes public. Pursuant to instructions received from the Clerk's office, a affidavit attesting to this significant security concern and setting forth Plaintiff's name and address, as well as the name of Plaintiff's decedent, is being submitted herewith. Plaintiff further respectfully requests that this affidavit remain under seal.

4. Finally, Plaintiff notes that other actions arising from the September 11, 2001 terrorist attacks have been brought under pseudonyms in order to protect the health, safety, welfare, and privacy interests of other victims of the September 11, 2001 attacks. *See, e.g., Jane Doe v. The Islamic Emirate of Afghanistan, et al.*, Civil Action No. 01-CV-9074 (S.D.N.Y.). Plaintiff respectfully requests that the Court follow this example set by other courts.

WHEREFORE, Plaintiff respectfully requests that he be granted leave to file this action under a pseudonym.

Respectfully submitted,

JUDICIAL WATCH, INC.



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