

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MONICAH OKOBA OPATI, in her own)
right, As Executrix of the ESTATE OF)
CAROLINE SETLA OPTI, Deceased)
))
SELIFAH ONGECHA OPATI as the child)
of CAROLINE SETLA OPTI, Deceased)
))
RAEL ANGARA OPATI as the child of)
CAROLINE SETLA OPTI, Deceased)
))
SALOME RATEMO, in his own right,)
As Executor of the ESTATE OF SALLY)
CECILIA MAMBOLEO, Deceased)
))
KEVIN RATEMO, as the son of SALLY)
CECILIA MAMBOLEO, Deceased)
))
FREDRICK RATEMO, as the son of)
SALLY CECILIA MAMBOLEO,)
Deceased)
))
LOUIS RATEMO as the son of SALLY)
CECILIA MAMBOLEO, Deceased)
))
STACY WAITHERA, as the daughter of)
PERRIS KAMAU, deceased, in the rights)
of her mother, PERRIS KAMAU, as)
daughter and lawful heir of JOEL)
GITUMBI KAMAU)
))
MICHAEL DANIEL WERE, as the son)
of WELLINGTON M. OLUOMA)
))
JUDITH NANDI BUSERA, Spouse of)
LIVINGSTONE BUSERA MADAHANA,)
an Employee of the United States)
Government or an Employee of a)
contractor for the United States)
Government)
))
))
))
))

CIVIL ACTION NO. 12-1224(JDB)

ROSELYNE KARSORANI, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

GEORGE MWANGI, son of)
CHARLES MWANGI NDIBUI,)
an Employee of the United States)
Government or an Employee of a)
contractor for the United States)
Government)

BERNARD MACHARI, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

GAD GIDEON ACHOLA, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

MARY NJOKI MUIRURI, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

JONATHAN KARANIA NDUTI, Spouse)
of MARY NJOKI MUIRURI)

GITIONGA MWANIKI, Spouse of)
MARY WANJURU GITONGA, an)
Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

ROSE NYETTE, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

ELIZABETH NZAKU, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

or an Employee of a Contractor for)
the United States Government)
)
PRISCAH OWINO, an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)
)
GREG OWINO, Spouse of)
PRISCAH OWINO)
)
MICHAEL KAMAU MWANGI, an)
Employee of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)
JOSHUA O. MAYUNZU, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)
ZACKARIA MUSALIA ATING'A, an)
Employee of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)
JULIUS M. NYAMWENO, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)
POLYCHEP ODHIAMBO, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)
DAVID JAIRUS AURA, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)
CHARLES OLOKA OPONDO, an)
Employee of the United States Government)
or an Employee of a Contractor for)
the United States Government)
)

ANN KANYAHA SALAMBA, an)
Employee of the United States Government)
or an Employee of a Contractor for)
the United States Government)

ERASTUS MIJUKA NDEDA, an)
Employee of the United States Government)
or an Employee of a Contractor for)
the United States Government)

TECHONIA OLOO OWITI, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

JOSEPH INGOSI, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

WILLIAM W. MAINA, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

PETER NGIGI MUGO, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

SIMON MWANHI NHURE, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

JOSEPH K. GATHUNGU, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

DIXON OLUBINZO INDIYA, an)
Employee of the United States Government)
or an Employee of a Contractor for)
the United States Government)

PETER NJENGA KUNGU, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

CHARLES GT. KABUI, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

JOHN KISWILLI, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

FRANSISCA KYALO, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)

CHARITY KITAO, as the daughter of)
ELIZABETH VICTORIA KITAO)

LEILANI BOWER, daughter of)
GERALD W. BOCHART,)
a United States citizen and an Employee)
of the United States Government)
or an Employee of a contractor for)
the United States Government)

WINNIE NDIODA KIMEU, a Minor,)
daughter of KIMEU NZIOKA NGANGA,)
deceased, by and through her Mother and)
Next Friend, MARY MUTHEU)
NDAMBUKI)

MICHAEL NGANGA KIMEU, son of)
KIMEU NZIOKA NGANGA, deceased)

AUDREY MAINI NASIEKU PUSSY,)
daughter of RACHEL MUNGASIA)
PUSSY, deceased)

KENNEDY OKELO, brother of LUCY)
GRACE ONONO, deceased)

HELLEN OKELO NYAIEGO, sister of)
LUCY GRACE ONONO, deceased)
)
RONALD OKELO, brother of LUCY)
GRACE ONONO, deceased)
)
ELIZABETH M. AKINYI OKELO, sister)
of LUCY GRACE ONONO, deceased)
)
LESLEY HELLEN ACHIENG, daughter)
of LUCY GRACE ONONO, deceased)
)
RISPAH JESSICA AUMA, daughter of)
LUCY GRACE ONONO, deceased)
)
STEPHEN JONATHAN OMANDI, son of)
LUCY GRACE ONONO, deceased)
)
ANDREW THOMAS OBONGO, son of)
LUCY GRACE ONONO, deceased)
)
LAURA MARGARET ATIENO, daughter)
of LUCY GRACE ONONO, deceased)
)
WALLACE NJOREGE STANLEY)
NYOIKE, brother of VINCENT KAMAU)
NYOIKE)
)
PETER KINYANJUI NGUGI, brother of)
PETER KABAU MACHARIA)
)
LUKAS NDILE KIMEU, a Minor, son of)
KIMEU NZIOKA NGANGA, deceased,)
by and through his Mother and Next)
Friend, MARY MUTHEU NDAMBUKI)
)
JACKSON KTHUVA MUSKOYA, son of)
DOMINIC MUSYOKA KITHUVA,)
deceased)
)
GLADYS MUNANIE MUSYOKA,)
daughter of DOMINIC MUSYOKA)
KITHUVA, deceased)
)
ARCY MUSYOKA KITHUVA, daughter)
of DOMINIC MUSYOKA KITHUVA,)

deceased)
)
JANE MUTUA, daughter of DOMINIC MUSYOKA KITHUVA, deceased)
)
MARY NZISIVA SAMUEL, daughter of DOMINIC MUSYOKA KITHUVA, deceased)
)
)
SYUINDO MUSYOKA, daughter of DOMINIC MUSYOKA KITHUVA, deceased)
)
)
KILEI MUSYOKA, daughter of DOMINIC MUSYOKA KITHUVA, deceased)
)
)
CONCEPTOR ORENDE, sister of ERIC ABUR ONYANGO, deceased)
)
)
GRACE BOSIBERI ONSONGO, sister of EVANS ONSONGO, deceased)
)
)
NEPHAT KIMATHI, a Minor, son of FRANCIS MBOGO NJUNG'E, deceased, by and through his Mother, SARAH MWENDIA MBOGO)
)
)
LEONARD SHINENGAH, an Employee of the United States Government or an Employee of a Contractor for the United States Government)
)
)
CAROLINE WANGU KARIGI, as the Daughter of LUCY KARIGI, deceased)
)
)
STEVE MARUNGI KARIGI, as the son of LUCY KARIGI, deceased)
)
)
MARTIN KARIGI, as the son of LUCY KARIGI, deceased)
)
)
WYCLIFFE OKELLO KHABUCHI, an Employee of the United States Government or an Employee of a Contractor for the United States Government)
)

**MARY SALIKU BULIMU, the Spouse of)
HESBON BULIMU, an Employee of)
the United States Government)
or an Employee of a Contractor for the)
United States Government)**

**HESBON LIHANDA, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)**

**WINIFRED MAINA, the Spouse of)
FRANCIS MAINA NDIBUI, an Employee)
of the United States Government)
or an Employee of a Contractor for the)
United States Government)**

**BETTY KAGAI, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government and/or)
the Mother of ELSIE KAGIMBI, an)
Employee of the United States Government)
or an Employee of a Contractor for the)
United States Government)**

**KATIMBA MOHAMED, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government)**

**FRIDA YOHAN MTITU, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government and/or)
the Spouse of GEOFFREY L. TUPPER, an)
Employee of the United States Government)
or an Employee of a Contractor for the)
United States Government)**

**GEOFFREY L. TUPPER, an Employee)
of the United States Government)
or an Employee of a Contractor for)
the United States Government and/or)
the Spouse of FRIDA YOHAN MTITU, an)
Employee of the United States Government)**

or an Employee of a Contractor for the)
United States Government)
)
OMAR ZUBERI OMAR, brother of)
ABDALLAH MOHAMED MNYOLYA,)
deceased)
)
ASHA R. MAHUNDI, daughter of)
RAMADHANI H. MAHUNDI, deceased)
)
EMMA R. MAHUNDI, daughter of)
RAMADHANI H. MAHUNDI, deceased)
)
MWAJUMA R. MAHUNDI, daughter of)
RAMADHANI H. MAHUNDI, deceased)
)
SHABAN R. MAHUNDI, son of)
RAMADHANI H. MAHUNDI, deceased)
)
JUMA R. MAHUNDI, son of)
RAMADHANI H. MAHUNDI, deceased)
)
AMIRI R. MAHUNDI, son of)
RAMADHANI H. MAHUNDI, deceased)
)
YUSUPH R. MAHUNDI, son of)
RAMADHANI H. MAHUNDI, deceased)
)
MWAJABU R. MAHUNDI, daughter of)
RAMADHANI H. MAHUNDI, deceased)
)
ALLY R. MAHUNDI, son of)
RAMADHANI H. MAHUNDI, deceased)
)
SAID R. MAHUNDI, son of)
RAMADHANI H. MAHUNDI, deceased)
)
ASHA SHABANI KILUWA, spouse of)
RAMADHANI H. MAHUNDI, deceased)
)
LEVIS MADAHANA BUSERA, son of)
LIVINGSTONE BUSERA MADAHANA)
)
EMMANUEL MUSAMBAYI BUSERA,)
son of LIVINGSTONE BUSERA)
MADAHANA)

CHRISTINE KAVAI BUSERA, daughter)
of LIVINGSTONE BUSERA)
MADAHANA)
)
AGNES TUPPER, daughter of)
FRIDA YOHAN MTITU)
)
SHAARDRACK UPPER, son of)
FRIDA YOHAN MTITU)
)
RONNIE GAUDENS, son of)
GAUDENS THOMAS)
)
SELINA GAUDENS, daughter of)
GAUDENS THOMAS)
)
MARY ESTHER KIUSA, daughter of)
HOSIANNA MMBAGA)
)
LEONARD RAJAB WAITHIRA, son of)
MARGARET W. NDUNGU)
)
JOSEPH NDUNGU WAITHIRA, son of)
MARGARET W. NDUNGU)
)
GRACE WANJIRU WAITHIRA, daughter)
of MARGARET W. NDUNGU)
)
BADAWY ITATI ALI, son of)
RUKIA WANHIRU ALI)
)
FRIDAH MAKENA ELIJAH, wife of)
CHARLES MKANATHA)
)
RUTH GATWIRI MWIRIGI, daughter of)
CHARLES NKANATHA)
)
JOAN KENDI MWIRIGI, daughter of)
CHARLES NKANATHA)
)
FRANCIS JOSEPH KWIMBERE,)
husband of EVITTA KWIMBERE)
)
IRENE FRANCIS KWIMBERE, daughter)
of EVITTA KWIMBERE)
)

FREDRICK FRANCIS KWIMBERE,)
daughter of EVITTA KWIMBERE)
)
SANI BENJAMIN FRANCIS)
KWIMBERE, son of EVITTA)
KWIMBERE)
)
BARBARA WOTHAYA OLAO, daughter)
of MILKA W. MACHARIA)
)
ALLAN COLLINS OLAO, son of)
MILKA W. MACHARIA)
)
LEVINA VALERIAN R. MINJA, wife of)
TIBRUSS MINJA)
)
VIOLET TIBRUSS MINJA, daughter of)
TIBRUSS MINJA)
)
EMMANUEL TIBRUSS MINJA, son of)
TIBRUSS MINJA)
)
NICKSON TIBRUSS MINJA, son of)
TIBRUSS MINJA)
)
REHANA MALIK, sister of)
NAFISA MALIK)
)
ELIZABETH CLIFFORD TARIMO,)
daughter of CLIFFORD TARIMO)
)
MARAGRET CLIFFORD TARIMO,)
daughter of CLIFFORD TARIMO)
)
MERCY NYOKABI NDIRITU, wife of)
MOSES M. KINYUA)
)
CHRISTOPHER NDIRITU, son of)
MOSES M. KINYUA)
)
DENIS KINYUA, son of MOSES M.)
KINYUA)
)
EDWIN KAARA MAGOTHE, son of)
MOSES M. KINYUA)
)

SEDRICK JEROME KEITH NAIR,)
husband of VALERIE NAIR)
)
TANYA NAIR, daughter of VALERIE)
NAIR)
)
VALENTINA HIZA, wife of)
CHRISTANT HIZA)
)
CHRISTOPHER HIZA, son of)
CHRISTANT HIZA)
)
CHRISTANTSON HIZA, son of)
CHRISTANT HIZA)
)
CHRISTEMARY HIZA, daughter of)
CHRISTANT HIZA)
)
SALIMA ISUMAIL, wife of)
ZEPHANIA J. MBOGE)
)
JOSEPH FARAHAT ABDALLAH, son of)
PAULINE D. ABDALLAH)
)
MAJDOLINE SARAH ABDALLAH,)
daughter of PAULINE D. ABDALLAH)
)
RISPAH AYSHA ABDALLA, son of)
PAULINE D. ABDALLAH)
)
FLAVIA KIYANGA, wife of)
FREDERICK KABODYA)
)
DIANA FREDERICK KIBODYA,)
daughter of FREDERICK KABODYA)
)
MARGARET NJERU MURIGI, wife of)
JOHN NDUATI)
)
BELONCE WAIRIMU MURIG, daughter)
Of JOHN NDUATI)
)
FAITH NJERI MURIGI, daughter of)
JOHN NDUATI)
)
)

MISHECK NDUATI MURIGI, son of)
JOHN NDUATI)
)
ERIC WAMBUA MWAKA, son of)
CHARLES MWAKA MULWA)
)
PETER MULWA MWAKA, son of)
CHARLES MWAKA MULWA)
)
FELIX MATHEKA MWAKA, son of)
CHARLES MWAKA MULWA)
)
CECILIA WAYUA MWAKA, daughter)
Of CHARLES MWAKA MULWA)
)
AGNES AKIWAL KUBAI, wife of)
BLASIO SHIKAMI KUBAI)
)
COLLINS KUBAI, son of)
BLASIO SHIKAMI KUBAI)
)
CELESTINE KUBAI, daughter of)
BLASIO SHIKAMI KUBAI)
)
SALINE KUBAI, daughter of)
BLASIO SHIKAMI KUBAI)
)
HELLEN JEPKORIR MARITIM, wife)
Of GIDEON K. MARITIM)
)
ALICE JEROP MARITIM, daughter of)
GIDEON K. MARITIM)
)
RUTH CHERONO MARITIM, daughter)
Of GIDEON K. MARITIM)
)
ANNE CHEPKEMOI MARITIM,)
daughter of GIDEON K. MARITIM)
)
SHEILA CHEBET MARITIM, daughter)
of GIDEON K. MARITIM)
SHARON CHEMELI MARITIM,)
daughter of GIDEON K. MARITIM)
)
EDGAR KIPLINO MARTIN, son of)
GIDEON K. MARITIM)

RAMMY KIPYEGO ROTICH, son of)
GIDEON K. MARITIM)
)
WAMBUI E. KUNGU, daughter of)
IRENE KUNG’U (KARITIHI))
)
LORNA N. KUNGU, daughter of)
IRENE KUNG’U (KARITIHI))
)
EDWARD G. KUNGU, son of)
IRENE KUNG’U (KARITIHI))
)
ONEAL EZEKIEL MDOBILU, son of)
JUSTINA MDOBILI)
)
PETER LOUS MDOBILU, son of)
JUSTINA MDOBILI)
)
JOHN GEORGE MDOBILU, son of)
JUSTINA MDOBILI)
)
KATHERINE ANNE MDOBILI,)
daughter of JUSTINA MDOBILI)
)
IMMANUEL SETVEN MDOBILU,)
son of JUSTINA MDOBILI)
)
ANIPHA SOLLY, wife of VICTOR)
MPOTO)
)
INOSENSIA MPOTO, daughter of)
VICTOR MPOTO)
)
DENIS MATERN, son of VICTOR)
MPOTO)
)
ANTHONY MUNGAI, son of DAVID)
KIBIRU)
)
BARBARA MUTHONI, daughter of)
DAVID KIBIRU)
)
EDDIE KIBURU, son of DAVID KIBIRU)
)
JOANNE NATALIE AWUOR OPORT,)
daughter of DOREEN OPORT)

YVONNE NATASHA AKINYI OPORT,
daughter of **DOREEN OPORT**

SALLY RISSY AUMA OPORT,
daughter Of **DOREEN OPORT**

MILICENT MALESI, son of HESBON
BULIMU

GODFREY JADEVERA, son of HESBON
BULIMU

LYDIA ANDEMO, daughter of HESBON
BULIMU

RODGERS AKIDIVA, son of HESBON
BULIMU

FRIDA MWANURU, daughter of
HESBON BULIMU

EMMILY MMBONE, daughter of
HESBON BULIMU

JACKSON MADEGWA, son of HESBON
BULIMU

MERCY MAKUNGU, daughter of
HESBON BULIMU

LYDIA OSEBE GWARO, daughter of
JULIUS OGORO

DEBORA MOIGE GWARO, daughter
of JULIUS OGORO

EMMANUEL OGORO GWARO, son
of JULIUS OGORO

JAMES OGWERI GWARO, son of
JULIUS OGORO

JOHN NDIBUI MWANGI, son of
CHARLES BDIBUI MWANGI

GIDEON WABWOBA OFISI, son of)
MARY OFISI)
)
ANDREW NHULI MAKAU, son of)
MARY OFISI)
)
FRANCIS WABUTI OFISI, daughter)
of MARY OFISI)
)
GEOFFREY MBUURI MBUGUA,)
son of STELLA WAMBUI MBUGUA)
)
ALEX JOHN MJUGUNA MBUGUA,)
son of STELLA WAMBUI MBUGUA)
)
ANNE WAMBUI NG'ANG'A, daughter)
of SAMMY MWANGI)
)
ESTHER NJERI NG'ANG'A, daughter)
of SAMMY MWANGI)
)
CATHERINE NJERI, daughter of)
SIMON MWANGI NGURE)
)
JACKSON NDNGU, son of SIMON)
MWANGI NGURE)
)
JOHN NGURE, son of SIMON MWANGI)
NGURE)
)
JOSEPH KAMBO, son of SIMON)
MWANGI NGURE)
)
JACKLINE WAMBUI, daughter of)
SIMON MWANGI NGURE)
)
JEFF RABAR ORIARO, son of)
SAMWEL ORIARO)
)
FELIX MUNGUTI, son of RAPHAEL)
PETER MUNGUTI)
)
PETRONILA KATHEO MUNGUTI,)
son of RAPHAEL PETER MUNHUTI)
)
)

ALEX KITHEU MUNHUTI, son of)
RAPHAEL PETER MUNHUTI)
)
ZAKAYO MATIKO, son of JOMO)
MATIKO BOKE)
)
JACOB GATI, son of JOMO MATIKO)
BOKE)
)
VALENTINE JEMO, son of JAMES)
NDEDA)
)
MAUREEN KADI, daughter of JAMES)
NDEDA)
)
BEVERLYNE KADI, daughter of JAMES)
NDEDA)
)
CECILIA DAYO, daughter of JAMES)
NDEDA)
)
DICKSON ULLETA LIHANDA,)
son of HESBON LIHANDA)
)
RUTH KAVERERI, daughter of)
HESBON LIHANDA)
)
BERYL SHIUMBE, son of WYCLIFFE)
OKELLO)
)
IRENE KHASANDE, daughter of)
WYCLIFFE OKELLO)
)
MICHAEL TSUMA, son of WYCLIFFE)
OKELLO)
)
LESLIE SAMBULI, daughter of EMILY)
KANAIZA MINAYO)
)
HARRIET CHORE, daughter of EMILY)
KANAIZA MINAYO)
)
JAMES JANDY MURABU, son of)
BELINDA CHAKA)
)
)

STANLEY CHAKA MURABU, son of)
BELINDA CHAKA)
)
STACEY NZALAMBI MURABU,)
daughter of BELINDA CHAKA)
)
IFURAIM ONYANGO OKUKU, son of)
BENSON OKUKU BWAKU)
)
CRISTINE NABWIRE OKUKU, daughter)
of BENSON OKUKU BWAKU)
)
JOSPEH KAMBO, son of SIMON)
MWANGI NGURE)
)
VALLEN ANDEYO, son of ZACKARIA)
MUSALIA ATING'A)
)
PETER MUYALE KUYA, Spouse of)
LOICE AMUKHULA KUYA, Deceased)
)
PENINAH AKWALE MUCII, Child of)
LOICE AMUKHULA KUYA, Deceased)
)
DANIEL AMBOKO KUYA, Child of)
LOICE AMUKHULA KUYA, Deceased)
)
NORMAN KAGAI, Spouse of BETTY)
KAGAI)
)
TABITHA KAGAI, Daughter of BETTY)
KAGAI)
)
CHARLES KAGAI, Son of BETTY)
KAGAI)
)
WENDY KAGAI, Daughter of BETTY)
KAGAI)
)
PAULINE AKOTH ADUNDO, Daughter)
of JOAN ADUNDO)
)
)
SAMUEL ODHIAMBO, Son of JOAN)
ADUNDO)
)

THERESA ACHIENG ADUNDO,)
Daughter of JOAN ADUNDO)
)
ISIDORE OPONDO ADUNDO,)
Daughter of JOAN ADUNDO)
)
ANNE WASONGA ADUNDO,)
Daughter of JOAN ADUNDO)
)
HENRY ALIVIZA SHITIAVAI, an)
Employee of the United States Government)
or an Employee of a contractor for)
the United States Government)
)
JUDY ALIVIZA SHITIAVAI, wife of)
HENRY ALIVIZA SHITIAVAI)
)
HUMPHEREY ALIVIZA, son of)
HENRY ALIVIZA SHITIAVAI)
)
COLLINS MUDAIDA ALIVIZA, son of)
HENRY ALIVIZA SHITIAVAI)
)
JACQUELINE ALIVIZA, daughter of)
HENRY ALIVIZA SHITIAVAI)
)
JARUHA YASHIEENA MUSALIA, child)
of ZACKARIA MUSALIA ATING'A)
)
FLORENCE MUSALIA, wife of)
ZACKARIA MUSALIA ATING'A)
)
ELLY MUGOVE MUSALIA, daughter of)
ZACKARIA MUSALIA ATING'A)
)
GLADIS LIHANDA, wife of HESBON)
LIHANDA)
)
JANE ISIAHO SHAMWAMA)
KHABUCHI, wife of WYCLIFFE)
OKELLO)
)
BEATRICE HOKA, daughter of MILLY)
ANDUSO)
)

JOAB ANDAYI MISANGO, son of)
MILLY ANDUSO)
)
IREEN SEMO, daughter of MILLY)
ANDUSO)
)
JOHNSTONE MUKABI, son of MILLY)
ANDUSO)
)
ANN WAIRIMU, daughter of MICHAEL)
KIARIE IKONYE)
)
MARYANN NJOKIE, daughter of)
MICHAEL KIARIE IKONYE)
)
DANIEL KIONGO, son of MICHAEL)
KIARIE IKONYE)
)
SAMMY NDUNGU KIARIE, son of)
MICHAEL KIARIE IKONYE)
)
FAITH MUTINDI, daughter of AARON)
MAKAU NDIVO)
)
JOYCE MUTHEU, daughter of AARON)
MAKAU NDIVO)
)
BEATRICE ATINGA, an Employee of the)
United States Government)
or an Employee of a contractor for)
the United States Government)
)
SAMMY ONZERE, spouse of BEATRICE)
ATINGA)
)
PURITY MUHONJA, daughter of)
BEATRICE ATINGA)
)
VICTOR ADEKA, son of BEATRICE)
ATINGA)
)
BRIAN KUBAI, son of BLASIO SKIKAMI)
KUBAI)
)
JOHN ZEPHANIA MBOGE, son of)
ZEPHANIA J. MDOGE)

)
JOYCE THADEI LOKOA, wife of)
GAUDENS THOMAS KUNAMBI)
)
MERESIANA (MARY) PAUL, daughter of)
ELIYA ELISHA PAUL)
)
RASHID SELEMANI KATIMBA, son of)
KATIMBA MOHAMED SELEMANI)
)
SAID SELEMANI KATIMBA, son of)
KATIMBA MOHAMED SELEMANI)
)
ASHA OMARI ABDULLAH, wife of)
KATIMBA MOHAMED SELEMANI)
)
AUGUST MAFFRY was an employee of)
the U.S. Government at the U.S. Embassy)
in Nairobi, Kenya)
)
CAROLINE S. MAFFRY, daughter of)
AUGUST MAFFRY)
)
ALISON D. MAFFRY, daughter of)
AUGUST MAFFRY)
)
ALICE-MARY TALBOT, sister of)
AUGUST MAFFRY)
)
ENNA JOHN OMOLO, daughter of)
BAKARI YUSUF NYUMBU)
)
LYNETTE OYANDA, daughter of)
TOBIAS OYANDA OTIENO)
)
LINDA OYANDA, daughter of TOBIAS)
OYANDA OTIENO)
)
FELOGENE OYANDA, daughter of)
TOBIAS OYANDA OTIENO)
)
CLAIRE OWINO, daughter PRISCAH)
OWINO)
)
KENNETH OWINO, son of PRISCAH)
OWINO)

**LAIR OWINO, daughter of PRISCAH
OWINO**

**JARROD OWINO, son of PRISCAH
OWINO**

Plaintiffs

v.

**REPUBLIC OF SUDAN
Ministry of External Affairs
People's Palace
Khartoum, Sudan**

and

**MINISTRY OF THE INTERIOR
OF THE REPUBLIC OF THE SUDAN
People's Palace
Khartoum, Sudan**

and

**THE ISLAMIC REPUBLIC OF IRAN
Ministry of Foreign Affairs
Khomeini Avenue
United Nations Street
Tehran, Iran**

and

**THE IRANIAN MINISTRY
OF INFORMATION AND SECURITY
Pasdaran Avenue
Golestan Yekom
Tehran, Iran,**

Defendants.

SECOND AMENDED COMPLAINT

Plaintiffs, MONICAH OKOBA OPATI, et al., file this lawsuit pursuant to the Foreign Sovereign Immunities Act, as amended, 28 U.S.C. § 1605A or its predecessor law, 28 U.S.C. § 1605(a)(7), to the extent it continues to apply to this case, and related statutes. The lawsuit is brought to recover for their damages suffered as a result of the Sudanese and Iranian sponsored terrorist attacks upon the Embassies of the United States located in Dar es Salaam, Tanzania and Nairobi, Kenya on August 7, 1998.

The scope of potential plaintiffs in a lawsuit brought under 28 U.S.C. § 1605A, the new state sponsor of terrorism exception to foreign sovereign immunity, includes non-US nationals if the “claimant or victim was at the time” of the terrorist bombing an “employee of the Government of the United States . . .” or were “an individual performing a contract awarded by the United States Government, acting within the scope of the employee’s employment” 28 U.S.C. § 1605A(a)(2)(A)(ii).

1. Jurisdiction in this Court arises pursuant to 28 U.S.C. §§ 1605A, 1330(a), 1331 and 1332(a)(2).

2. The Plaintiffs in this case are some U.S. nationals and numerous non-U.S. nationals who were an “employee of the Government of the United States . . .” or were “an individual performing a contract awarded by the United States Government, acting within the scope of the employee’s employment” at the time of the bombings.

3. Subject matter jurisdiction is properly asserted under 28 U.S.C. § 1605A. The Foreign Sovereign immunities Act provides that there “shall” be personal jurisdiction over a foreign state whenever there is subject matter jurisdiction over a claim for relief plus effective

service of process. 28 U.S.C. § 1330(b).¹

4. While acting within the scope of their employment or office, agents, employees and officials of the Islamic Republic of Iran (“Iran”) provided the technical know-how and tactical training that allowed Al Qaeda to build the bombs that destroyed the embassies. This qualifies as material support as it is defined under 28 U.S.C. § 1605A.

5. While acting within the scope of their employment or office, agents, employees and officials of the Republic of Sudan (“Sudan”) provided a broad range of critical support to Al Qaeda over a number of years without which Al Qaeda would have never been able to relocate from Afghanistan to Africa or grow into an organization capable of performing the attacks on the embassies. This qualifies as material support as it is defined under 28 U.S.C. § 1605A.

6. The provision of material support by Iran and the Sudan meets the requirements for subject matter jurisdiction established by 28 U.S.C. § 1605A as to the US national and non-national plaintiffs. 28 U.S.C. § 1605A allows non-US nationals, if the claimant or the victim was an “employee of the Government of the United States . . .”, or were “an individual performing a contract awarded by the United States Government, acting within the scope of the employee’s employment” 28 U.S.C. § 1605A(a)(2)(A)(ii), to bring suit against the state-sponsors of terrorism who caused their personal injury or death. All non-US nationals were either an employee of the Government of the United States, an individual performing a contract awarded by the United States Government, acting within the scope of the employee’s

¹ Hereinafter, subsequent references to 28 U.S.C. § 1605A are intended to encompass both 28 U.S.C. § 1605A and its predecessor law, 28 U.S.C. § 1605(a)(7), to the extent it continues to apply to this case. 28 U.S.C. § 1605A on its face creates subject matter jurisdiction for US nationals and non-US national who were “employee[s] of the Government of the United States” or were “an individual performing a contract awarded by the United States Government, acting within the scope of the employee’s employment” 28 U.S.C. § 1605A(a)(2)(A)(ii). 28 U.S.C. § 1605(a)(7) only creates subject matter jurisdiction for US nationals.

employment or a family member thereof.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(f)(4).

8. The causes of action contained in the eight counts later enumerated herein in this Complaint are based upon the following sources of law:

a. a new federal private right of action 28 U.S.C. § 1605A(c), which is available both to US national and non-US national Plaintiffs and wherever the common or statutory law of a Plaintiff's residence contains rights or makes further damages available that are not duplicative of the recovery afforded under 28 U.S.C. § 1605A(c) as Plaintiffs have causes of action under the common or statutory law of the US state or foreign country where they were domiciled at the time of the attack;

b. for the non-US nationals Plaintiffs, who do not possess a cause of action under 28 U.S.C. § 1605A, the common and statutory laws of the District of Columbia or Kenya or Tanzania for wrongful death, solatium, loss of consortium, assault and battery, intentional infliction of emotional distress and survival, whether statutory or common law.

PARTIES

1. Plaintiff, MONICAH OKOBA OPATI, is a citizen of Kenya and is the daughter of the late CAROLINE SETLA OPATI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right, in her capacity as Executrix and as a beneficiary of the Wrongful Death, Survival and

other claims pled in this Complaint, and on behalf of her siblings, RAEL ANGARA OPATI and SELIFAH ONGECHA OPATI.

2. Plaintiff, SALOME RATEMO, is a citizen of Kenya and is the son of the late SALLY CECILIA MAMBOLEO, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right, in his capacity as Executor and as a beneficiary of the Wrongful Death, Survival and other claims pled in this Complaint, and on behalf of his siblings, KEVIN RATEMO, FREDRICK RATEMO, and LOUIS RATEMO.

3. Plaintiff, STACY WAITHERA, is a citizen of Kenya and is the daughter of PERRIS KAMAU, who was the daughter of JOEL GITUMBI KAMAU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government, and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right, in her capacity as Executrix and as a beneficiary of the Wrongful Death, Survival and other claims pled in this Complaint, and on behalf of her mother, PERRIS KAMAU, deceased.

4. Plaintiff, MICHAEL DANIEL WERE, is a citizen of Kenya and is the son of the late WELLINGTON M. OLUOMA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress, and on his father's behalf in his capacity as Executor of the Estate of WELLINGTON M. OLUOMA, deceased, for claims pled in this Complaint.

5. Plaintiff, JUDITH NANDI BUSERA, is a citizen of Kenya and is the spouse of LIVINGSTONE BUSERA MADAHANA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and who was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

6. Plaintiff, ROSELYNE KARSORANI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in her own right.

7. Plaintiff, GEORGE MWANGI, is a citizen of Kenya and is the son of CHARLES MWANGI NDIBUI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and who was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, and brings this action in his own right and for his loss of society and severe emotional distress.

8. Plaintiff, BERNARD MACHARI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his own right.

9. Plaintiff, GAD GIDEON ACHOLA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

10. Plaintiff, MARY NJOKI MUIRURI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in her own right.

11. Plaintiff, JONATHAN KARANI NDUTI, a citizen of Kenya and the spouse of MARY NIOKI MUIRURI, was employed by the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

12. Plaintiff, GITIONGA MWANIKI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

13. Plaintiff, ROSE NYETTE, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in her own right.

14. Plaintiff, ELIZABETH NZAKU, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in her own right.

15. Plaintiff, PATRICK NYETTE injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his own right.

16. Plaintiff, CORNEL KEBUNGO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

17. Plaintiff, PHOEBE KEBUNGO, a citizen of Kenya and the spouse of CORNEL KEBUNGO, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

18. Plaintiff, JOAN ADUNDO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

19. Plaintiff, BENARD ADUNDO, a citizen of Kenya and the spouse of JOAN ADUNDO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

20. Plaintiff, NANCY NJOKI MACHARIA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right. Plaintiff is also the spouse of STANLEY KINYUA MACHARIA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

21. Plaintiff, SALLY OMONDI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

22. Plaintiff, JAEL NYOSIEKO OYOO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was employed by the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

23. Plaintiff, EDWIN OYOO, a citizen of Kenya and the spouse of JAEL NYOSIEKO OYOO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

24. Plaintiff, MIRIAM MUTHONI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

25. Plaintiff, PRISCAH OWINO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

26. Plaintiff, GREG OWINO, is a citizen of Kenya and is spouse of PRISCAH OWINO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and brings this action in his/her own right for his/her loss of society and severe emotional distress.

27. Plaintiff, MICHAEL KAMAU MWANGI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

28. Plaintiff, JOSHUA O. MAYUNZU, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

29. Plaintiff, ZACKARIA MUSALIA ATING'A, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

30. Plaintiff, JULIUS M. NYAMWENO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

31. Plaintiff, POLYCHEP ODHIAMBO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

32. Plaintiff, DAVID JAIRUS AUARA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a

contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

33. Plaintiff, CHARLES OLOKA OPONDO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

34. Plaintiff, ANN KANYAHA SALAMBA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

35. Plaintiff, ERASTUS MIJUKA NDEDA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

36. Plaintiff, TECHONIA OLOO OWITI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

37. Plaintiff, JOSEPH INGOSI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

38. Plaintiff, WILLIAM W. MAINA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a

contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

39. Plaintiff, PETER NGIGI MUGO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

40. Plaintiff, SIMON MWANHI NHURE, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

41. Plaintiff, JOSEPH K. GATHUNGU, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

42. Plaintiff, DIXON OLUBINZO INDIYA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

43. Plaintiff, PETER NJENGA KUNGU, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

44. Plaintiff, CHARLES GT. KABUI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

45. Plaintiff, JOHN KISWILLI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

46. Plaintiff, FRANSISCA KYALO, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

47. Plaintiff, CHARITY KITAO, a citizen of Kenya and the daughter of ELIZABETH VICTORIA KITAO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

48. Plaintiff, LEILANI BOWER, a citizen of Kenya and the daughter of GERALD W. BOCHART, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

49. Plaintiff, PETER KINYANJUI NGUGI, is a citizen of Kenya and is the brother of PETER KABAU MACHARIA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

50. Plaintiff, WALLACE NJOREGE STANLEY NYOIKE, is a citizen of Kenya and is the brother of VINCENT KAMAU NYOIKE, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

51. Plaintiff, LAURA MARGARET ATIENO, is a citizen of Kenya and is the daughter of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

52. Plaintiff, ANDREW THOMAS OBONGO, is a citizen of Kenya and is the son of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

53. Plaintiff, STEPHEN JONATHAN OMANDI, is a citizen of Kenya and is the son of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

54. Plaintiff, RISPAAH JESSICA AUMA, is a citizen of Kenya and is the daughter of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

55. Plaintiff, LESLEY HELLEN ACHIENG, is a citizen of Kenya and is the daughter of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a

contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

56. Plaintiff, ELIZABETH M. AKINYI OKELO, is a citizen of Kenya and is the sister of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

57. Plaintiff, RONALD OKELO, is a citizen of Kenya and is the, brother of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

58. Plaintiff, HELLEN OKELO NYAIEGO, is a citizen of Kenya and is the, sister of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

59. Plaintiff, KENNEDY OKELO, is a citizen of Kenya and is the sister of LUCY GRACE ONONO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

60. Plaintiff, AUDREY NAINI NASIEKU PUSSY, is a citizen of Kenya and is the daughter of RACHEL MUNGASIA PUSSY, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

61. Plaintiff, MICHAEL NGANGA KIMEU, is a citizen of Kenya and is the son of KIMEU NZIOKA NGANGA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

62. Plaintiff, WINNIE NDIODA KIMEU, is a citizen of Kenya and is the daughter of KIMEU NZIOKA NGANGA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

63. Plaintiff, LUKAS NDILE KIMEU, a minor, is a citizen of Kenya and is the son of KIMEU NZIOKA NGANGA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress through his mother and next friend, MARY MUTHEU NDAMBUKI.

64. Plaintiff, JACKSON KITHUVA MUSKOYA, is a citizen of Kenya and is the son of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

65. Plaintiff, GLADYS MUNANIE MUSYOKA, is a citizen of Kenya and is the daughter of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

66. Plaintiff, MARCY MUSYOKA KITHUVA, is a citizen of Kenya and is the daughter of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S.

Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

67. Plaintiff, JANE MUTUA, is a citizen of Kenya and is the daughter of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

68. Plaintiff, MARY NZISIVA SAMUEL, is a citizen of Kenya and is the daughter of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

69. Plaintiff, SYUINDO MUSYOKA, is a citizen of Kenya and is the daughter of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

70. Plaintiff, KILEI MUSYOKA, is a citizen of Kenya and is the daughter of DOMINIC MUSYOKA KITHUVA, deceased, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

71. Plaintiff, CONCEPTOR ORENDE, is a citizen of Kenya and is the sister of ERIC ABUR ONYANGO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

72. Plaintiff, GRACE BOSIBERI ONSONGO, is a citizen of Kenya and is the sister of EVANS ONSONGO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

73. Plaintiff, NEPHAT KIMATHI, is a citizen of Kenya and is the son of FRANCIS MBOGO NJUNG'E, deceased, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya, and brings this action in his/her own right for his loss of society and severe emotional distress.

74. Plaintiff, LEONARD SHINENGAH, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

75. Plaintiff, CAROLINE WANGU KARIGI, is a citizen of Kenya and is the daughter of LUCY KARIGI, deceased, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya, and brings this action in his/her own right for her loss of society and severe emotional distress.

76. Plaintiff, STEVE MARUNGI KARIGI, is a citizen of Kenya and is the son of LUCY KARIGI, deceased, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya, and brings this action for his loss of society and severe emotional distress.

77. Plaintiff, MARTIN KARIGI, is a citizen of Kenya and is the son of LUCY KARIGI, deceased, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya, and brings this action in his/her own right for his loss of society and severe emotional distress.

78. Plaintiff, WYCLIFFE OKELLO KHABUCHI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

79. Plaintiff, MARY SALIKU BULIMU, is a citizen of Kenya and is the spouse of HESBON BULIMU, deceased, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya, and brings this action in his/her own right for her loss of society and severe emotional distress.

80. Plaintiff, HESBON LIHANDA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right.

81. Plaintiff, WINIFRED MAINA, is a citizen of Kenya and is the spouse of FRANCIS MAINA NDIBUI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

82. Plaintiff, BETTY KAGAI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his/her own right. Plaintiff is also the mother of ELSIE KAGIMBI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

83. Plaintiff, KATIMBA MOHAMED, injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Tanzania who brings this action in his own right.

84. Plaintiff, FRIDA YOHAN MTITU, injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Tanzania who brings this action in her own right. Plaintiff is also the spouse of GEOFFREY L. TUPPER, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

85. Plaintiff, GEOFFREY L. TUPPER, injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Tanzania who brings this action in his own right. Plaintiff is also the spouse of FRIDA YOAHN MTITU, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

86. Plaintiff, OMAR ZUBERI OMAR, is a citizen of Tanzania and is the brother of ABDALLAH MOHAMED MNYOLYA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

87. Plaintiff, ASHA R. MAHUNDI, is a citizen of Tanzania and is the daughter of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

88. Plaintiff, EMMA R. MAHUNDI, is a citizen of Tanzania and is the daughter of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

89. Plaintiff, MWAJUMA R. MAHUNDI, is a citizen of Tanzania and is the daughter of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

90. Plaintiff, SHABAN R. MAHUNDI, is a citizen of Tanzania and is the son of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

91. Plaintiff, JUMA R. MAHUNDI, is a citizen of Tanzania and is the son of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee

of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

92. Plaintiff, AMIRI R. MAHUNDI, is a citizen of Tanzania and is the son of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

93. Plaintiff, YUSUPH R. MAHUNDI, is a citizen of Tanzania and is the son of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

94. Plaintiff, MWAJABU R. MAHUNDI, is a citizen of Tanzania and is the daughter of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

95. Plaintiff, ALLY R. MAHUNDI, is a citizen of Tanzania and is the son of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

96. Plaintiff, SAID R. MAHUNDI, is a citizen of Tanzania and is the son of RAMADHANI H. MAHUNDI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

97. Plaintiff, ASHA SHABANI KILUWA, is the spouse of RAMADHANI H. MAHUNDI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in his/her own right for loss of consortium, loss of society and severe emotional distress.

98. Plaintiff, LEVIS MADAHANA BUSERA, is a citizen of Kenya and is the son of LIVINGSTONE BUSERA MADAHANA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

99. Plaintiff, EMMANUEL MUSAMBAYI BUSERA, is a citizen of Kenya and is the son of LIVINGSTONE BUSERA MADAHANA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

100. Plaintiff, CHRISTINE KAVAI BUSERA is a citizen of Kenya and is the daughter of LIVINGSTONE BUSERA MADAHANA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

101. Plaintiff, AGNES TUPPER is a citizen of Tanzania and is the daughter of FRIDA YOHAN MTITU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es

Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

102. Plaintiff, SHAADRACK TUPPER is a citizen of Tanzania and is the daughter of FRIDA YOHAN MTITU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

103. Plaintiff, RONNIE GAUDENS is a citizen of Tanzania and is the son of GAUDENS THOMAS, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar Es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

104. Plaintiff, SELINA GAUDENS is a citizen of Tanzania and is the daughter of GAUDENS THOMAS, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

105. Plaintiff, MARY ESTHER KIUSA is a citizen of Tanzania and is the daughter of HOSIANNA MMBAGA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar Es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

106. Plaintiff, LOENARD RAJAB WAITHIRA is a citizen of Kenya and is the son of MARGARET W. NDUNGU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

107. Plaintiff, JOSEPH NDUNGU WAITHIRA is a citizen of Kenya and is the daughter of MARGARET W. NDUNGU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

108. Plaintiff, GRACE WANJIRU WAITHIRA is a citizen of Kenya and is the daughter of MARGARET W. NDUNGU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

109. Plaintiff, BADAWEY ITATI ALI is a citizen of Kenya and is the son of RUKIA WANJIRU ALI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

110. Plaintiff, FRIDA MAKENA ELIJAH is a citizen of Kenya and is the wife of CHARLES NKANATHA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy

at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

111. Plaintiff, RUTH GATWITI is a citizen of Kenya and is the daughter of CHARLES NKANATHA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

112. Plaintiff, JOAN KENDI MWIRIGI is a citizen of Kenya and is the daughter of CHARLES NKANATHA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

113. Plaintiff, FRANCIS JOSEPH KWIMBERE is a citizen of Tanzania and is the husband of EVITTA KWIMBERE, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

114. Plaintiff, IRENCE FRANCIS KWIMBERE is a citizen of Tanzania and is the daughter of EVITTA KWIMBERE, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

115. Plaintiff, FREDRICK FRANCIS KWIMBERE is a citizen of Tanzania and is the son of EVITTA KWIMBERE, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

116. Plaintiff, SANI BENJAMIN FRANCIS KWIMBERE is a citizen of Tanzania and is the son of EVITTA KWIMBERE, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

117. Plaintiff, BARABARA WOTHAYA OLAO is a citizen of Kenya and is the daughter of MILKA W. MACHARIA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

118. Plaintiff, ALLEN COLLINS OLAO is a citizen of Kenya and is the son of MILKA W. MACHARIA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

119. Plaintiff, LEVINA VALERIAN T. MINJA is a citizen of Tanzania and is the wife of TIBRUSS MINJA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy

at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

120. Plaintiff, VIOLET TIBRUSS MINJA is a citizen of Tanzania and is the daughter of TIBRUSS MINJA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

121. Plaintiff, EMMANUEL TIBRUSS MINJA is a citizen of Tanzania and is the son of TIBRUSS MINJA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

122. Plaintiff, NICKSON TIBRUSS MINJA is a citizen of Tanzania and is the son of TIBRUSS MINJA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

123. Plaintiff, REHANA MALIK is a citizen of Kenya and is the sister of NAFISA MALIK, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

124. Plaintiff, ELIZABETH CLIFFORD TARIMO is a citizen of Tanzania and is the daughter of CLIFFORD TARIMO, who was employed by the U.S. Government or an employee

of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

125. Plaintiff, MARGARET CLIFFORD TARIMO is a citizen of Tanzania and is the daughter of CLIFFORD TARIMO, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

126. Plaintiff, MERCY MYOKABI NDIRITU is a citizen of Kenya and is the wife of MOSES M. KINYUA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

127. Plaintiff, DENIS KINYUA is a citizen of Kenya and is the son of MOSES M. KINYUA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

128. Plaintiff, CHRISTOPHER NDIITU KINYUA is a citizen of Kenya and is the son of MOSES M. KINYUA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

129. Plaintiff, EDWIN KAARA MAGOTHE is a citizen of Kenya and is the son of MOSES M. KINYUA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

130. Plaintiff, SEDRICK JEROME KEITH NAIR is a citizen of Tanzania and is the husband of VALERIE NAIR, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

131. Plaintiff, TANYA NAIR is a citizen of Tanzania and is the daughter of VALERIE NAIR, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

132. Plaintiff, VALENTINA HIZA is a citizen of Kenya and is the wife of CHRISTANT HIZA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

133. Plaintiff, CHRISTOPHER HIZA is a citizen of Kenya and is the son of CHRISTANT HIZA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at

Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

134. Plaintiff, CHRISTANTSON HIZA is a citizen of Kenya and is the son of CHRISTANT HIZA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

135. Plaintiff, CHRISTERMARY HIZA is a citizen of Kenya and is the daughter of CHRISTANT HIZA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

136. Plaintiff, SALIMA ISUMAIL is a citizen of Kenya and is the wife of ZEPHANIA J. MDOGE, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

137. Plaintiff, JOSEPH ABDALLAH is a citizen of Kenya and is the son of PAULINE D. ABDALLAH, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

138. Plaintiff, MAJODOLINE SARAH ABDALLAH is a citizen of Kenya and is the daughter of PAULINE D. ABDALLAH, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

139. Plaintiff, RISPAAH AYSHA ABDDALLA is a citizen of Kenya and is the daughter of PAULINE D. ABDALLAH, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

140. Plaintiff, FLAVIA KIYANGA is a citizen of Kenya and is the wife of FREDERICK KABODYA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

141. Plaintiff, DIANA FREDERICK KIBODYA is a citizen of Kenya and is the daughter of FREDERICK KABODYA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

142. Plaintiff, MARGARET NJERU MURIGI is a citizen of Kenya and is the daughter of JOHN NDUATI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at

Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

143. Plaintiff, BELONCE WAIRIMU MURIG is a citizen of Kenya and is the daughter of JOHN NDUATI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

144. Plaintiff, FAITH NJERI MURIGI is a citizen of Kenya and is the daughter of JOHN NDUTAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

145. Plaintiff, MISHECK NDUATI MURIGI is a citizen of Kenya and is the son of JOHN NDUTAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

146. Plaintiff, ERIC WAMBUA MWAKE is a citizen of Kenya and is the son of CHARLES MWAKA MULWA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

147. Plaintiff, PETER MULWA MWAKA is a citizen of Kenya and is the son of CHARLES MWAKA MULWA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

148. Plaintiff, FELIX MATHEKA MWALA is a citizen of Kenya and is the son of CHARLES MWAKA MULWA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

149. Plaintiff, CECILIA WAYUA MWAKA is a citizen of Kenya and is the daughter of CHARLES MWAKA MULWA, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

150. Plaintiff, AGNES AKIAL KUBAI is a citizen of Kenya and is the wife of BLASIO SKIKAMI KUBAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

151. Plaintiff, COLLINS KUBAI is a citizen of Kenya and is the son of BLASIO SKIKAMI KUBAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at

Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

152. Plaintiff, CELESTINE KUBAI is a citizen of Kenya and is the daughter of BLASIO SKIKAMI KUBAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

153. Plaintiff, SALINE KUBAI is a citizen of Kenya and is the daughter of BLASIO SKIKAMI KUBAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

154. Plaintiff, HELLEN JEPKRIR MARITIM is a citizen of Kenya and is the wife of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

155. Plaintiff, ALICE JEROP MARITIM is a citizen of Kenya and is the daughter of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

156. Plaintiff, RUTH CHERONO MARITIM is a citizen of Kenya and is the daughter of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

157. Plaintiff, ANNE CHEPKEMOI MARITIM is a citizen of Kenya and is the daughter of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

158. Plaintiff, SHEILA CHEBET MARITIM is a citizen of Kenya and is the daughter of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

159. Plaintiff, SHARON CHEMELI MARITIM is a citizen of Kenya and is the daughter of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

160. Plaintiff, EDGAR KIPLIMO MARITIM is a citizen of Kenya and is the son of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy

at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

161. Plaintiff, RAMMY KIPYEGO ROTICH is a citizen of Kenya and is the son of GIDEON K. MARITIM, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

162. Plaintiff, WAMBUI E. KUNGU is a citizen of Kenya and is the daughter of IRENE KUNG'U (KARIITHI) who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

163. Plaintiff, LORNA N. KUNGU is a citizen of Kenya and is the daughter of IRENE KUNG'U (KARIITHI) who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

164. Plaintiff, EDWARD H. KUNGU is a citizen of Kenya and is the son of IRENE KUNG'U (KARIITHI) who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

165. Plaintiff, ONAEL EZEKIEL MDOBILU is a citizen of Kenya and is the husband of JUSTINA MDOBILU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

166. Plaintiff, PETER LOUIS MDOBILU is a citizen of Kenya and is the son of JUSTINA MDOBILU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

167. Plaintiff, JOHN GEORGE MDOBILU is a citizen of Kenya and is the son of JUSTINA MDOBILU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

168. Plaintiff, KATHERINE ANNE MDOBILU is a citizen of Kenya and is the daughter of JUSTINA MDOBILU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

169. Plaintiff, IMMANUEL STEVE MDOBILU is a citizen of Kenya and is the son of JUSTINA MDOBILU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy

at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

170. Plaintiff, ANIPHA SOLLY is a citizen of Kenya and is the wife of VICTOR MPOTO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

171. Plaintiff, INOSENSIA MPOTO is a citizen of Kenya and is the daughter of VICTOR MPOTO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

172. Plaintiff, DENIS MATERN is a citizen of Kenya and is the son of VICTOR MPOTO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

173. Plaintiff, ANTHONY MUNGAI is a citizen of Kenya and is the son of DAVID KIBIRU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

174. Plaintiff, BARBARA MUNGAI is a citizen of Kenya and is the daughter of DAVID KIBIRU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi,

Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

175. Plaintiff, EDDIE KIBURU is a citizen of Kenya and is the son of DAVID KIBIRU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

176. Plaintiff, JOANNE NATALIE AWUOR OPORT is a citizen of Kenya and is the daughter of DOREEN OPORT who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

177. Plaintiff, YVONNE NATASHA AKINYI OPORT is a citizen of Kenya and is the daughter of DOREEN OPORT who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

178. Plaintiff, SALLY RISSY AUMA OPORT is a citizen of Kenya and is the daughter of DOREEN OPORT who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

179. Plaintiff, MILICENT MALESI is a citizen of Kenya and is the son of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the

U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

180. Plaintiff, GODFREY JADEVERA is a citizen of Kenya and is the son of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

181. Plaintiff, LYDIA ANDEMO is a citizen of Kenya and is the daughter of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

182. Plaintiff, RODGERS AKIDIVA is a citizen of Kenya and is the son of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

183. Plaintiff, FRIDA MWANURU is a citizen of Kenya and is the daughter of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

184. Plaintiff, EMMILY MMBONE is a citizen of Kenya and is the daughter of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

185. Plaintiff, JACKSON MADEGWA is a citizen of Kenya and is the son of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

186. Plaintiff, MERCY MAKUNGU is a citizen of Kenya and is the son of HESBON BULIMU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

187. Plaintiff, LYDIA OSEBE GWARO is a citizen of Kenya and is the daughter of JULIUS OGORO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

188. Plaintiff, DEBORA MOIGE GWARO is a citizen of Kenya and is the daughter of JULIUS OGORO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at

Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

189. Plaintiff, EMMANUEL OGORO GWARO is a citizen of Kenya and is the son of JULIUS OGORO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

190. Plaintiff, JAMES OGORO GWARO is a citizen of Kenya and is the son of JULIUS OGORO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

191. Plaintiff, JOHN NDIBUI MWANGI is a citizen of Kenya and is the son of CHARLES NDIBUI MWANGI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

192. Plaintiff, GIDEON WABWOBA OFISI is a citizen of Kenya and is the son of MARY OFISI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

193. Plaintiff, ANDREW NHULI MAKAU is a citizen of Kenya and is the son of MARY OFISI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

194. Plaintiff, FRANCIS WABUTI OFISI is a citizen of Kenya and is the son of MARY OFISI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

195. Plaintiff, GEOFRREY MBUURI MBUDUA is a citizen of Kenya and is the son of STELLA WAMBUI MBUDUA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

196. Plaintiff, ALEX JOHN NJUGUNA MBUGUA is a citizen of Kenya and is the son of STELLA WAMBUI MBUDUA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

197. Plaintiff, ANNE WAMBUI NG'ANG'A is a citizen of Kenya and is the daughter of SAMMY MWANGI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy

at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

198. Plaintiff, ESTHER NJERI NG'ANG'A is a citizen of Kenya and is the daughter of SAMMY MWANGI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

199. Plaintiff, CATHERINE NJERI is a citizen of Kenya and is the daughter of SIMON MWANGI NGURE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

200. Plaintiff, JACKSON NDUNGU is a citizen of Kenya and is the son of SIMON MWANGI NGURE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

201. Plaintiff, JOHN NGURE is a citizen of Kenya and is the son of SIMON MWANGI NGURE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

202. Plaintiff, JOSEPH KAMBO is a citizen of Kenya and is the son of SIMON MWANGI NGURE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

203. Plaintiff, JACKLINE WAMBUI is a citizen of Kenya and is the daughter of SIMON MWANGI NGURE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

204. Plaintiff, JEFF RABAR ORIARO is a citizen of Kenya and is the son of SAMWEL ORIARO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

205. Plaintiff, FLEIX MUNGUTI is a citizen of Kenya and is the son of RAPHAEL PETER MUNGUTI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

206. Plaintiff, PETRONILA KATHEO MUNGUTI is a citizen of Kenya and is the son of RAPHAEL PETER MUNGUTI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S.

Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

207. Plaintiff, ALEX KITHEU MUNGUTI is a citizen of Kenya and is the son of RAPHAEL PETER MUNGUTI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

208. Plaintiff, ZAKAYO MATIKO is a citizen of Kenya and is the son of JOMO MATIKO BOKE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

209. Plaintiff, JACOB GATI is a citizen of Kenya and is the son of JOMO MATIKO BOKE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

210. Plaintiff, VALENTINE JEMO is a citizen of Kenya and is the son of JAMES NDEDA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

211. Plaintiff, MAUREEN KADI is a citizen of Kenya and is the daughter of JAMES NDEDA who was employed by the U.S. Government or an employee of a contractor for the U.S.

Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

212. Plaintiff, BEVERLYNE KADI is a citizen of Kenya and is the daughter of JAMES NDEDA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

213. Plaintiff, CECILIA DAYO is a citizen of Kenya and is the daughter of JAMES NDEDA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

214. Plaintiff, DICKSON ULLETA LIHANDA is a citizen of Kenya and is the son of HESBON LIHANDA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

215. Plaintiff, RUTH KAVERERI is a citizen of Kenya and is the daughter of HESBON LIHANDA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

216. Plaintiff, BERYL SHIUMBE is a citizen of Kenya and is the son of WYCLIFFE OKELLO who was employed by the U.S. Government or an employee of a contractor for the

U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

217. Plaintiff, IRENE KHASANDE is a citizen of Kenya and is the daughter of WYCLIFFE OKELLO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

218. Plaintiff, MICHAEL TSUMA is a citizen of Kenya and is the son of WYCLIFFE OKELLO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

219. Plaintiff, LESLIE SAMBULI is a citizen of Kenya and is the daughter of EMILY KANAIZA MINAYO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

220. Plaintiff, HARRIET CHORE is a citizen of Kenya and is the daughter of EMILY KANAIZA MINAYO who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

221. Plaintiff, JAMES JANDY MURABU is a citizen of Kenya and is the son of BELINDA CHAKA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

222. Plaintiff, STANLEY CHAKA MURABU is a citizen of Kenya and is the son of BELINDA CHAKA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

223. Plaintiff, STACEY NZALAMBI MURABU is a citizen of Kenya and is the daughter of BELINDA CHAKA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

224. Plaintiff, IFURAIM ONYANGO OKUKU is a citizen of Kenya and is the son of BENSON OKUKU BWAKU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

225. Plaintiff, CRISTINE NABWIRE OKUKU is a citizen of Kenya and is the daughter of BENSON OKUKU BWAKU who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the

U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

226. Plaintiff, LUCY MUTHONI KAMBO is a citizen of Kenya and is the daughter of SIMON MWANGI NGURE who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

227. Plaintiff, VALLEN ANDEYO is a citizen of Kenya and is the son of ZACKARIA MUSALIA ATING'A who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

228. Plaintiff, PETER MUYALE KUYA, is a citizen of Kenya and is the spouse of LOICE AMUKHULA KUYA, deceased, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was killed as a result of the August 7, 1998 terrorist attack on the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right, in his capacity as Executor and as a beneficiary of the Wrongful Death, Survival and other claims pled in this Complaint.

229. Plaintiff, PENINAH AKWALE MUCII is a citizen of Kenya and is the child of LOICE AMUKHULA KUYA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his/her own right for his/her loss of society and severe emotional distress.

230. Plaintiff, DANIEL AMBOKO KUYA is a citizen of Kenya and is the child of LOICE AMUKHULA KUYA who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

231. Plaintiff, NORMAN KAGAI, is a citizen of Kenya and is the spouse of BETTY KAGAI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

232. Plaintiff, TABITHA KAGAI, is a citizen of Kenya and is the daughter of BETTY KAGAI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

233. Plaintiff, WENDY KAGAI, is a citizen of Kenya and is the daughter of BETTY KAGAI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

234. Plaintiff, CHARLES KAGAI, is a citizen of Kenya and is the son of BETTY KAGAI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

235. Plaintiff, PAULINE AKOTH ADUNDO, a citizen of Kenya and the daughter of JOAN ADUNDO, who was an employee of the U.S. Government or an employee of a contractor

for the U.S. Government, and brings this action in her own right for her loss of society and severe emotional distress.

236. Plaintiff, SAMUEL ODHIAMBO, a citizen of Kenya and the SON of JOAN ADUNDO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his own right for his loss of society and severe emotional distress.

237. Plaintiff, TERESA ACHIENG ADUNDO, a citizen of Kenya and the daughter of JOAN ADUNDO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in her own right for her loss of society and severe emotional distress.

238. Plaintiff, ISIDORE OPONDO ADUNDO, a citizen of Kenya and the daughter of JOAN ADUNDO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in her own right for her loss of society and severe emotional distress.

239. Plaintiff, ANNE WASONGA ADUNDO, a citizen of Kenya and the daughter of JOAN ADUNDO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in her own right for her loss of society and severe emotional distress.

240. Plaintiff, HENRY ALIVIZA SHITIAVAI, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in his own right.

241. Plaintiff, JUDY ALIVIZA SHITIAVAI, a citizen of Kenya and the daughter of HENRY ALIVIZA SHIIAVAI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

242. Plaintiff, HUMPHEREY ALIVIZA, a citizen of Kenya and the son of HENRY ALIVIZA SHIIAVAI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

243. Plaintiff, COLLINS MUDAIDA ALIVIZA, a citizen of Kenya and the son of HENRY ALIVIZA SHIIAVAI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his loss of society and severe emotional distress.

244. Plaintiff, JACQUELINE ALIVIZA, a citizen of Kenya and the daughter of HENRY ALIVIZA SHIIAVAI, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

245. Plaintiff, JARUHA YASHIEENA MUSALIA, a citizen of Kenya and the daughter of ZACKARIA MUSALIA ATING'A, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

246. Plaintiff, ELLY MUGOVE MUSALIA, a citizen of Kenya and the daughter of ZACKARIA MUSALIA ATING'A, who was an employee of the U.S. Government or an

employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

247. Plaintiff, FLORENCE MUSALIA, a citizen of Kenya and the wife of ZACKARIA MUSALIA ATING'A, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

248. Plaintiff, JANE ISIAHO SHAMWAMA KHABUCHI, a citizen of Kenya and the wife of WYCLIFFE OKELLO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for her loss of society and severe emotional distress.

249. Plaintiff, GLADIS LIHANDA, a citizen of Kenya and the wife of HESBON LIHANDA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

250. Plaintiff, BEATRICE HOKA, a citizen of Kenya and the daughter of MILLY ANDUSO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

251. Plaintiff, JOAB ANDAYI MISANGO, a citizen of Kenya and the son of MILLY ANDUSO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

252. Plaintiff, IREEN SEMO, a citizen of Kenya and the daughter of MILLY ANDUSO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

253. Plaintiff, JOHNSTONE MUKABI, a citizen of Kenya and the son of MILLY ANDUSO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

254. Plaintiff, ANN WAIRIMU, a citizen of Kenya and the daughter of MICHAEL KIARIE IKONYE, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

255. Plaintiff, MARYANN NJOKIE, a citizen of Kenya and the daughter of MICHAEL KIARIE IKONYE, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

256. Plaintiff, DANIEL KIONGO, a citizen of Kenya and the son of MICHAEL KIARIE IKONYE, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

257. Plaintiff, SAMMY NDUNGU KIARIE, a citizen of Kenya and the son of MICHAEL KIARIE IKONYE, who was an employee of the U.S. Government or an employee of

a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

258. Plaintiff, FAITH MUTINDI, a citizen of Kenya and the daughter of AARON MAKAU NDIVO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

259. Plaintiff, JOYCE MUTHEU, a citizen of Kenya and the daughter of AARON MAKAU NDIVO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

260. Plaintiff, BEATRICE ATINGA, injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya, was an employee of the U.S. Government or an employee of a contractor for the U.S. Government and is a citizen of Kenya who brings this action in her own right.

261. Plaintiff, SAMMY ONZERE, a citizen of Kenya and the spouse of BEATRICE ATINGA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

262. Plaintiff, PURITY MUHONJA, a citizen of Kenya and the daughter of BEATRICE ATINGA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

263. Plaintiff, VICTOR ADEKA, a citizen of Kenya and the son of BEATRICE ATINGA, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government, and brings this action in his/her own right for his/her loss of society and severe emotional distress.

264. Plaintiff, BRIAN KUBAI, is a citizen of Kenya and is the son of BLASIO SKIKAMI KUBAI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Nairobi, Kenya. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

265. Plaintiff, JOHN ZEPHANIA MBOGE is a citizen of Tanzania and is the son of ZEPHANIA J. MBOGE, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar Es Salaam, Tanzania. Plaintiff brings this action in his own right, in his capacity as Executor and as a beneficiary of the Survival and other claims pled in this Complaint.

266. Plaintiff, JOYCE THADEI LOKOA is a citizen of Tanzania and is the wife of GAUDENS PAUL KUNAMBI, who was employed by the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

267. Plaintiff, MERESIANA (MARY) PAUL is a citizen of Tanzania and is the daughter of ELIYA ELISHA PAUL, who was employed by the U.S. Government and was killed in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

268. Plaintiff, RASHID SELEMANI KATIMBA, is a citizen of Tanzania and is the son of KATIMBA MOHAMED SELEMANI who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar Es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

269. Plaintiff, SAID SELEMANI KATIMBA, is a citizen of Tanzania and is the son of KATIMBA MOHAMED SELEMANI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar Es Salaam, Tanzania. Plaintiff brings this action in his own right for his loss of society and severe emotional distress.

270. Plaintiff, ASHA OMARI ABDULLAH, is a citizen of Tanzania and is the wife of KATIMBA MOHAMED SELEMANI, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and was injured in the terrorist bombing of the U.S. Embassy at Dar Es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

271. Plaintiff, AUGUST MAFFRY, a citizen of the United States, was an employee of the U.S. Government at the U.S. Embassy in Nairobi, Kenya and was physically injured during the 1998 terrorist attack, and brings this action in his own right for compensation for his physical injuries and severe emotional distress.

272. Plaintiff, CAROLINE S. MAFFRY, a citizen of United States and the daughter of AUGUST MAFFRY, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

273. Plaintiff, ALISON D. MAFFRY is a citizen of United States and the daughter of AUGUST MAFFRY, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

274. Plaintiff, ALICE-MARY TALBOT, a citizen of United States and the sister of AUGUST MAFFRY, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

275. Plaintiff, ENNA JOHN OMOLO, a citizen of Tanzania and the daughter of BAKARI YUSUF NYUMBU, who was employed by the U.S. Government or an employee of a contractor for the U.S. Government and who died in the terrorist bombing of the U.S. Embassy at Dar es Salaam, Tanzania. Plaintiff brings this action in her own right for her loss of society and severe emotional distress.

276. Plaintiff, LYNETTE OYANDA, a citizen of Kenya and the daughter of TOBIAS OYANDA OTIENO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

277. Plaintiff, LINDA OYANDA, a citizen of Kenya and the daughter of TOBIAS OYANDA OTIENO, who was an employee of the U.S. Government or an employee of a contractor for the U.S. Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

278. Plaintiff, FELOGENE OYANDA, a citizen of Kenya and the daughter of TOBIAS OYANDA OTIENO, who was an employee of the U.S. Government or an employee of

a contractor for the U.S. Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

279. Plaintiff, CLAIRE OWINO, a citizen of Kenya and the daughter of PRISCAH OWINO, who was an Employee of the United States Government or an Employee of a contractor for the United States Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in her own right for her loss of society and severe emotional distress.

280. Plaintiff, KENNETH OWINO, a citizen of Kenya and the son of PRISCAH OWINO, who was an Employee of the United States Government or an Employee of a contractor for the United States Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in his own right for his loss of society and severe emotional distress.

281. Plaintiff, LAIR OWINO, a citizen of Kenya and the daughter of PRISCAH OWINO, who was an Employee of the United States Government or an Employee of a contractor for the United States Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in his own right for his loss of society and severe emotional distress.

282. Plaintiff, JARROD OWINO, a citizen of Kenya and the son of PRISCAH OWINO, who was an Employee of the United States Government or an Employee of a contractor for the United States Government at the U.S. Embassy in Nairobi, Kenya, and brings this action in his own right for his loss of society and severe emotional distress.

B. Defendants:

283. Defendant, the **REPUBLIC OF SUDAN** (hereinafter referred to as "Sudan"), is a foreign state within the meaning of 28 U.S.C. § 1391(f) and 1603(a).

284. SUDAN has been designated as a foreign state that sponsors terrorism within the meaning of 28 U.S.C. § 1605A and the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j), and the Foreign Assistance Act of 1961, 22 U.S.C. §2371.

285. SUDAN, through its officials, officers, agents and employees, provided material support and resources to OSAMA BIN LADEN and AL QAEDA. The support provided by SUDAN to OSAMA BIN LADEN and AL QAEDA assisted in or contributed to the preparation and execution of the plans that culminated in the U.S. Embassy bombings at Nairobi, Kenya, and Dar Es Salaam, Tanzania, and the extrajudicial killing and/or injury of the Plaintiffs.

286. The Defendant, the Ministry of the Interior of the Republic of Sudan, is an agency of Defendant, the Republic of Sudan. Its activities at the time of this occurrence included the support of terrorist activities directed against foreign targets by terrorist groups operating with cover of the Republic of Sudan.

287. Defendant, the **ISLAMIC REPUBLIC OF IRAN** (hereinafter referred to as "Iran"), is a foreign state within the meaning of 28 U.S.C. §1391(f) and 1603(a).

288. Defendant, IRAN, has been designated as a foreign state that sponsors terrorism within the meaning of 28 U.S.C. § 1605A and the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j), and the Foreign Assistance Act of 1961, 22 U.S.C. §2371.

289. Defendant, IRAN, has been found to be liable as a state sponsor of international terrorism under 28 U.S.C. § 1605(a)(7), especially in connection with acts perpetrated by its state sponsored paramilitary terrorist organization known as "Hezbollah," in various cases before this court, including *Anderson v. the Islamic Republic of Iran*, 90 F. Supp. 2d 107 (D.D.C. 2000), and *Cicippio v. Islamic Republic of Iran*, 18 F. Supp. 2d 62 (D.D.C. 1998).

290. IRAN, through its officials, officers, agents and employees including the Ministry of Foreign Affairs, the Iranian Ministry of Information and Security, and Iranian Revolutionary Guard Corps, provided material support and resources to OSAMA BIN LADEN and AL QAEDA both directly and through its surrogate, Hezbollah. The support provided by IRAN to OSAMA BIN LADEN and AL QAEDA assisted in or contributed to the preparation and execution of the plans that culminated in the terrorist bombing of the U.S. Embassies at Nairobi, Kenya, and Dar es Salaam, Tanzania, and the deaths and injuries caused by those bombings.

291. The Defendant, the Iranian Ministry of Information and Security, is a political subdivision and/or agency of Defendant, the Islamic Republic of Iran. Its activities at the time of this occurrence included the support of terrorist activities directed against foreign targets by terrorist groups operating with cover of the Islamic Republic of Iran.

FACTS

A. The history, organization, and function of Al Qaeda:

292. In or about 1989, OSAMA BIN LADEN, MUHAMMAD ATEF, and others founded an international terrorist group that became known as "AL QAEDA" ("the Base"). OSAMA BIN LADEN was the "emir" (prince) of AL QAEDA and was its leader at all relevant times. Members of AL QAEDA pledged an oath of allegiance (called a "bayat") to OSAMA BIN LADEN and AL QAEDA.

293. From 1989 until about 1991, AL QAEDA was headquartered in AFGHANISTAN and in Peshawar, Pakistan. In or about 1991, the leadership of AL QAEDA, including OSAMA BIN LADEN, relocated to the Sudan. AL QAEDA was headquartered in the Sudan from approximately 1991 until approximately 1996 but also maintained offices in various parts of the

world. In 1996, OSAMA BIN LADEN and other members of AL QAEDA relocated to AFGHANISTAN.

294. OSAMA BIN LADEN and AL QAEDA violently opposed the United States for several reasons. First, the United States was regarded as an "infidel" because it was not governed in a manner consistent with the group's extremist interpretation of Islam. Second, the United States was viewed as providing essential support for other "infidel" governments and institutions, particularly the governments of Saudi Arabia and Egypt, the nation of Israel, and the United Nations organization, which were regarded as enemies of the group. Third, AL QAEDA opposed the involvement of the United States armed forces in the Gulf War in 1991 and in Operation Restore Hope in Somalia in 1992 and 1993. In particular, AL QAEDA opposed the continued presence of American military forces in Saudi Arabia (and elsewhere on the Saudi Arabian peninsula) following the Gulf War. Fourth, AL QAEDA opposed the United States Government because of the arrest, conviction and imprisonment of persons belonging to AL QAEDA or its affiliated terrorist groups or those with whom it worked. For these and other reasons, OSAMA BIN LADEN declared "*ji*had," or holy war, against the United States, which he had carried out through AL QAEDA and its affiliated organizations.

295. AL QAEDA functioned both on its own and through some of the terrorist organizations that operated under its umbrella, including: Egyptian Islamic Jihad, which was led by Ayman al-Zawahiri, and at times, the Islamic Group (also known as "el Gamaa Islamia" or simply "Gamaa't"), and a number of jihad groups in other countries, including the Sudan, Egypt, Saudi Arabia, Yemen, Somalia, Eritrea, Djibouti, Afghanistan, Pakistan, Bosnia, Croatia, Albania, Algeria, Tunisia, Lebanon, the Philippines, Tajikistan, Azerbaijan, and the Kashmiri region of India and the Chechnyan region of Russia. AL QAEDA also maintained cells and

personnel in a number of countries to facilitate its activities, including in Kenya, Tanzania, the United Kingdom, Germany, Canada, Malaysia, and the United States.

296. AL QAEDA had a command and control structure which included a "*majlis al shura*" (or consultation council) which discussed and approved major undertakings, including terrorist operations.

297. AL QAEDA had a "military committee" which considered and approved "military" matters.

298. OSAMA BIN LADEN and AL QAEDA also forged alliances with the National Islamic Front in the Sudan, with representatives of IRAN, and its associated terrorist group Hezbollah, and with representatives of the government of IRAQ for the purpose of working together against their perceived common enemy in the West, the United States.

299. Since at least 1989, OSAMA BIN LADEN and the terrorist group AL QAEDA sponsored, managed, and/or financially supported training camps in AFGHANISTAN. Those camps were used to instruct members and associates of AL QAEDA and its affiliated terrorist groups in the use of firearms, explosives, chemical weapons, and other weapons of mass destruction. In addition to providing training in the use of various weapons, these camps were used to conduct operational planning against United States targets around the world and experiments in the use of chemical and biological weapons. These camps were also used to train others in security and counterintelligence methods, such as the use of codes and passwords, and to teach members and associates of AL QAEDA about traveling to perform operations. For example, AL QAEDA instructed its members and associates to dress in "Western" attire and to use other methods to avoid detection by security officials. The group also taught its members and

associates to monitor media reports of its operations to determine the effectiveness of their terrorist activities.

300. Since on or about 1996, OSAMA BIN LADEN and others operated AL QAEDA from their headquarters in AFGHANISTAN. During this time, OSAMA BIN LADEN and others forged close relations with the TALIBAN and MUHAMMAD OMAR in AFGHANISTAN. OSAMA BIN LADEN openly informed other AL QAEDA members and associates outside AFGHANISTAN of their support of, and alliance with, the TALIBAN and MUHAMMAD OMAR.

B. The “fatwabs” and the “jihad” terrorist campaign against Americans:

301. One of the principal goals of AL QAEDA was to drive the United States armed forces out of Saudi Arabia (and elsewhere on the Saudi Arabian peninsula) and Somalia by violence. These goals eventually evolved into a declaration of *jihad* against America and all Americans. Members of AL QAEDA issued "*fatwabs*" (rulings on Islamic law) indicating that such attacks on Americans were both proper and necessary.

302. At various times from on or about 1992, OSAMA BIN LADEN, working together with members of the *fatwah* committee of AL QAEDA, disseminated *fatwabs* to other members and associates of AL QAEDA. These *fatwabs* directed that United States citizens should be attacked and murdered.

303. On various occasions, OSAMA BIN LADEN and other co-conspirators advised members of AL QAEDA that it was proper to engage in violent actions against "infidels" (nonbelievers), even if others might be killed by such actions, because if the others were "innocent," they would go to paradise, and if they were not "innocent," they deserved to die.

C. The sovereign nation defendants furnished critical aid to underwrite the terrorist conspiracy against the United States:

304. In furtherance of the conspiracy, the named Defendants and unknown John Doe Defendants committed the following acts:

a. At various times from at least as early as 1990, Defendants and their unknown co-conspirators provided military and intelligence training in various areas, including AFGHANISTAN, IRAQ, IRAN, Pakistan, and the Sudan, for the use of AL QAEDA and its affiliated groups.

b. At various times from at least as early as 1989, Defendants and others known and unknown, engaged in financial and business transactions on behalf of AL QAEDA, including, but not limited to: purchasing land for training camps; purchasing warehouses for storage of items, including explosives; purchasing communications and electronics equipment; transferring funds between corporate accounts; and transporting currency and weapons to members of AL QAEDA and its associated terrorist organizations in various countries throughout the world.

c. In the early 1990s, the government of Sudan sent overtures to Bin Laden and Al Qaeda, inviting the group to relocate en mass from Afghanistan to the Sudan. Jamal Ahmed Al-Fadl, a top Al Qaeda lieutenant who served Bin Laden in Afghanistan as well as the Sudan, learned of the impending relationship between Al Qaeda and the Sudanese government for the first time at one of the meetings in Peshwar, Pakistan that occurred between the Sudanese government, Bin Laden and other Al Qaeda members. The representatives of the Sudanese government, promised the support of that government should Al Qaeda come to the Sudan. Al Qaeda thereafter used Sudanese Airways planes to ferry anti-tank rockets and Stinger missiles from Afghanistan to the Sudan.

d. The government of the Sudan is run by President Field Marshall Omar Hassan al-Bashir, the head of state of the Sudan, through an alliance of the military and the National Congress Party, formerly the National Islamic Front.

e. Al-Fadl went to the Sudan to secure residential and commercial property for Al Qaeda. The purpose of some of the property was to provide a safe place to train Al Qaeda militants.

f. Essam Al Riddi, a pilot who worked for Bin Laden in 1993, stated that he purchased a plane for Bin Laden; oversaw its refurbishment; and flew it to Khartoum in 1993.

g. While Al Riddi stayed in Khartoum, he dined with Bin Laden and had several discussions with him. Bin Laden was staying in a large villa in Khartoum, with an office and a guesthouse. The Sudanese government provided security for Al Qaeda. 15-20 Sudanese men dressed in Sudanese army fatigues, using jeeps with Sudanese army license plates, were stationed at the villa.

h. Al Qaeda provided Al Riddi with a plane from the Sudan Airlines to ferry militants to Nairobi. Bin Laden discussed the possibility of Al Riddi transporting some Stinger missiles from Pakistan to the Sudan.

i. Bin Laden assured him that the Sudanese and Pakistani intelligence agencies would cooperate with the weapons transfer.

j. The training that Al Qaeda engaged in the Sudan included explosives training. The loud noises drew the local police after complaints from neighbors and Al Fadl was among those arrested. He was quickly released, due to the close relationship between Al Qaeda, and the Sudanese intelligence service, a Defendant in this action. According to Al-Fadl:

[W]e call the intelligence office because we have relationship with them, and the intelligence office came and they tell the local police we take care of that, and don't

worry about that. And they take us to the jail, and they say you shouldn't do that, we tell you to refresh², not to make real explosives.

k. Al-Fadl saw a letter from President al-Bashir that explained the relationship between Al Qaeda and the Sudanese intelligence. With the explicit approval of Bin Laden, Al-Fadl also personally worked with the Sudanese intelligence officers.

l. The Sudanese intelligence officers and government officials, at all times, acted within the scope of their office or agency during the activities described in this Complaint.

m. The intelligence officers were organized into a "delegation office" to meet the needs of the Al Qaeda group in the Sudan. There was an explicit fear that agents from foreign governments or informants would disclose Al Qaeda's location and activities in the Sudan. Some of these informants were consequently jailed in the Sudan. Al-Fadl would identify suspicious foreigners to the Sudanese intelligence as Al Qaeda sought to keep its presence and activities in the Sudan secret.

n. The delegation office, staffed with Sudanese intelligence officers, also helped provide security for Al Qaeda and facilitated the movement of weapons in and out of the country. On one particular trip, the weapons were taken out of the country by delivering four crates of weapons to a hangar at a Sudanese military base, and then to a port facility owned by the Sudanese army.

o. The letter from President al-Bashir was absolutely essential to the operations of the Al Qaeda terrorist group, which was secretly training in the Sudan. The letter allowed Al Qaeda members, such as Al Fadl, to bypass tax and customs collection on international shipments and guaranteed their shipments, coming or going, would not be inspected.

² "Refresh" meant refresher courses for the militants who had already received training in the past.

p. Weapons and explosive shipments moved through a quay protected by the Sudanese military in Port Sudan into a barracks used by Sudanese armored and mechanized infantry. The letter would allow shipments from overseas to bypass inspection at a port and then travel back to Khartoum without inspection by the local police at the numerous checkpoints along the way.

q. The delegation office, the Sudanese government's go-between with Al Qaeda, also protected Al Qaeda members, such as Al-Fadl, from the interference of Sudanese immigrations office at the airport. This was important because if Al Qaeda members were caught abroad and their passports were stamped with Sudanese immigration markings, it would be clear to foreign agents where the organization was located.

r. Al Qaeda also set up a number of companies that provided it with critical income so that it could continue its growth and evolution into a lethal organization with global reach. However, Al Qaeda did not come to Sudan to operate as a regular capitalist enterprise. Rather, the purpose of the investment in Sudanese business activity was as an adjunct to its mission of aggression against the West, as explicitly stated by Bin Laden himself:

. . . [O]ur agenda is bigger than business. We not going to make business here, but we need to help the government and the government help our group, and this our purpose.

s. Among the Sudanese companies founded by Al Qaeda were: Laden International Company for import and export; Taba Investment for currency exchange; Hijra Construction Company, which built the largest road existing in Sudan; and the Al Themar al Mubaraka, which ran the farm where Al Qaeda trained its militants in explosives. The Hijra Construction Company purchased explosives for its road and bridge building activities.

t. Al Qaeda also had extensive holdings in Khartoum, including business offices, guesthouses, farms and residential houses. Bin Laden even had a bank account in Khartoum in his true name. Al Qaeda purchased some of the companies directly from the Sudanese government. The funding that these companies provided to Al Qaeda was critical to its survival and continued existence. At a meeting, which included Bin Laden, the fluctuation of Sudanese currency caused great concern as most of Al Qaeda's income was derived from this business activity.

u. Al Qaeda's position regarding the United States was clear, as early as, in 1992 when Bin Laden issued a fatwa against the United States due to its presence in the Gulf region during the First Gulf War and its actions in Somalia. The discussion surrounding the fatwa included an explicit allowance for the murder of innocent civilians. Al Qaeda provided support to groups in Somalia, Yemen, the Philippines, Tajikistan, and Pakistan, among others.

v. The partnership forged with the Sudanese government derived benefits for both parties, as do all successful partnerships. The Sudanese government employed Al Qaeda to manufacture chemical weapons in a section of Khartoum, called Hilat Koko, for use against the rebels in southern Sudan. Al-Fadl traveled to the chemical weapons manufacturing area with a Sudanese military officer, who explained the need for chemical weapons by the Sudanese government.

w. Al Qaeda also provided communications equipment and Kalishnikov rifles for the Sudanese army, founded by the Islamic National Front, to fight the Christian rebels in the south. Al-Fadl, as part of this arrangement, also worked directly for the Sudanese government. For example, a Sudanese intelligence officer who also worked in the immigration office approached Al-Fadl and asked him to spy on a government opposition leader. Al-Fadl arrested the

opposition leader and tried to turn him away from his work against the Sudanese government. The Sudanese intelligence officer advised Al-Fadl to lie to the opposition leader, to tell him that Al-Fadl had quit Al Qaeda and had stopped working with the government. Al-Fadl reported back to the head of the delegation office, the group of Sudanese intelligence officers that protected Al Qaeda; facilitated communications with the Sudanese government; and provided logistical support.

x. Dr. Abdullah Mohamed Yusef, a member of the Islamic National Front, through which President al-Bashir ran the Sudanese government, organized travel, documents and funneled economic aid to Al Qaeda while it was located in the Sudan.

y. Al Qaeda entered into a transaction to purchase uranium through the former President of the Sudan, currently an officer in the Sudanese army. The quality of the uranium was tested in Hilat Koko, the section of Khartoum where the government was partnered with Al Qaeda in the manufacture of chemical weapons. Al-Fadl discussed the uranium test with a member of the Sudanese government, whose brother “runs” the building where the chemical weapon manufacture was housed.

z. Without the material support, assistance, and aid provided by Sudanese government officials acting within the scope of their agency, employment or office, Al Qaeda could not have carried out the United States embassy bombings that caused plaintiffs’ injuries. Such material support, assistance, and aid fits within the definition of material support as described by 18 U.S.C. § 2339A.

aa. The Defendants not only knew that Al Qaeda was attempting to conceal itself in the Sudan, but facilitated and furthered Al Qaeda’s concealment through the activities of the Sudanese intelligence services. The scale of support that Defendants furnished Al Qaeda was

substantial. The regime invited Al Qaeda to roost in the Sudan and knew of, at least from 1992 onward, Al Qaeda's anti-US crusade.

bb. The then and current regime of Sudan explicitly allied itself with Al Qaeda for an illegal and unlawful purpose. The regime conspired with Al Qaeda in the manufacture of weapons and training of terrorists, all the while knowing of Al Qaeda's anti-US crusade. The provision of support to a terrorist organization is illegal and unlawful. The explicit purpose of their agreement was to make each stronger. The US Embassy bombings greatly enhanced Al Qaeda's worldwide reputation and attracted money, recruits and support from those allied against the United States.

cc. At various times from at least 1990, IRAN has provided material support to OSAMA BIN LADEN and AL QAEDA, often through its state-sponsored terrorist organization, Hezbollah. That support included advice and assistance in planning attacks against American targets. Information was often shared and exchanged between AL QAEDA and IRAN.

dd. For many years, the Department of State has included IRAN among the "*state sponsors of terrorism*." Indeed, more than once in recent years, the Department of State has described IRAN as "*the most active*" among state sponsors of terrorism. The formation of Hezbollah and its emergence as a major terrorist organization was the product of direct intervention by Iranian operatives, including the Iranian Revolutionary Guards and the Defendant, the Iranian Ministry of Information. The above referred to activities of Hezbollah were financed, technologically supported and commanded by Iranian military/intelligence operatives.

ee. In October 2001, an OSAMA BIN LADEN operative, Ali Mohamed, confessed in Federal District Court in New York that he and senior Bin Laden operatives had met with

Hezbollah security chief Imad Mughniyah who is believed to have carried out the bombings of the U.S. Embassy in Beirut and the Marine barracks in 1983.

ff. On many occasions, Bin Laden had praised the 1983 Beirut Marine barracks bombing conducted by Hezbollah and Iranian agents. Bin Laden sought out Hezbollah and their Iranian commanders for their tactical expertise for large scale operations. In 1993-4, Al Qaeda operatives received specialized-explosives training in Lebanon from Hezbollah operatives.

gg. In June 1996, Iran's Ministry of Information and Security hosted a meeting of terrorist leaders in Tehran that included Mugniyah and senior aides to OSAMA BIN LADEN. Senior aides to OSAMA BIN LADEN subsequently met with Mugniyah on several occasions.

hh. The purpose of the meetings between Bin Laden, Al Qaeda, Hezbollah operatives, and Iranian agents was to share information on how to build a technologically advanced bomb that could destroy a building. Al Qaeda did not have the know-how, prior to its contacts with Hezbollah operatives and Iranian agents, to conduct the 1998 embassy bombings.

ii. Based on evidence developed in connection with the war in Afghanistan, senior officials in the U.S. Government, including Secretary of Defense Donald Rumsfeld, believe that AL QAEDA and TALIBAN members have now taken refuge in IRAN.

305. The officials, agents, and employees of the foreign sovereign Defendants were acting within the scope of their agency, office or employment when they provided support to the terrorists and terrorist group that destroyed the two US embassies. They did so because, for various reasons, it was the policy of their respective governments to aid Al Qaeda.

D. The events leading up to the Embassy bombings:

306. On or about 1994, MOHAMED SADEEK ODEH moved to Mombassa, Kenya, to set up businesses with AL QAEDA money which was used to support AL QAEDA members in

Kenya. While in Kenya, ODEH was visited by MUHAMMED ATEF, the military commander of AL QAEDA.

307. In or about 1994, WADIH EL HAGE moved to Nairobi, Kenya, and established businesses and other organizations (*e.g.*, “Help Africa People”) in Kenya. While in Kenya, WADIH EL HAGE met repeatedly with one of Al Qaeda’s military commanders, the late Abu Ubaidah al Banshiri.

308. On or about October 25, 1994, Khalid Al Fawwaz, a member of AL QAEDA, transferred the Kenyan business “Asma Limited” to the late Abu Ubaidah al Banshiri.

309. In or about 1996, in Mombasa, Kenya, Fahid Ali Msalam, a member of AL QAEDA, displayed explosives and detonators obtained in Tanzania to MOHAMED SADEEK ODEH.

310. Beginning in the latter part of 1993, Anas Al Liby and other members of AL QAEDA began contemplating an attack against the U.S. Embassy in Nairobi, Kenya, in retaliation for the United States’ participation in Operation Restore Hope in Somalia.

311. In or about the latter part of 1993, Anas Al Liby and others conducted a visual and photographic surveillance of the U.S. Embassy at Nairobi, Kenya.

312. In or about 1994, Anas Al Liby, together with other members of AL QAEDA reviewed files concerning possible terrorist attacks against: (i) the U.S. Embassy at Nairobi, Kenya; (ii) the building then housing the U.S. Agency for International Development in Nairobi, Kenya; and (iii) British, French and Israeli targets in Nairobi, Kenya.

313. In or about 1994, members of AL QAEDA also contemplated possible terrorist attacks against targets in various countries other than Kenya.

314. In or about 1994, KHALFAN KHAMIS MOHAMED traveled to an AL QAEDA camp in Afghanistan where he received training in explosives.

315. Beginning in or about 1996, MOHAMED RASHED DAOUD AL-'OWHALI traveled to an AL QAEDA camp in Afghanistan where he received training in explosives, hijacking, kidnapping, assassination and intelligence techniques.

316. In or about 1996, following his training in a number of camps in Afghanistan affiliated with AL QAEDA, MOHAMED RASHED DAOUD AL-'OWHALI met with OSAMA BIN LADEN and asked him for a "mission."

317. In late February or early March 1997, WADIH EL HAGE, met and spoke with Mustafa Mohamed Fadhil, a member of AL QAEDA, and provided him with a new policy from OSAMA BIN LADEN to militarize the East African cell of AL QAEDA.

318. On or about June 23, 1997, WADIH EL HAGE requested that \$10,000 be transferred to an account in Kenya. On or about July 3, 1997, this money was transferred to an account in Kenya controlled by WADIH EL HAGE.

319. In or about March or April 1998, in Dar es Salaam, Tanzania, KHALFAN KHAMIS MOHAMED met with Mustafa Mohamed Fadhil, a member of AL QAEDA, and agreed to participate in a "jihad job."

320. In or about May 1998, Fazul Abdullah Mohamed, a member of AL QAEDA, rented a villa at 43 New Runda Estates in Nairobi, Kenya.

321. On or about May 4, 1998, KHALFAN KHAMIS MOHAMED applied for a Tanzanian passport in the name "Zahran Nassor Maulid."

322. In or about June 1998, MOHAMED RASHED DAOUD AL-'OWHALI, and an individual known as "Azzam" filmed a videotape to celebrate their anticipated "martyrdom" in a bombing operation to be conducted against United States interests in East Africa.

323. On or about June 19, 1998, "Azzam," using a passport in the name of "Gihad Ali," traveled from Karachi, Pakistan, to Nairobi, Kenya.

324. In or about June 1998, KHALFAN KHAMIS MOHAMED and Fahid Ali Msalam, purchased a white Suzuki Samurai ("the Suzuki Samurai") at a location in Dar es Salaam, Tanzania.

325. In or about June 1998, KHALFAN KHAMIS MOHAMED and Fahid Ali Msalam, rented house number 213 in the Ilala District of Dar es Salaam, Tanzania.

326. In or about late June or early July 1998, Fahid Ali Msalam and Sheikh Ahmed Salim Swedan, a member of AL QAEDA, purchased a Toyota Dyna truck ("the Nairobi Bomb Truck") in Mombasa, Kenya, and made alterations to the back of the truck.

327. In or about July 1998, Ahmed Khalfan Ghailani, a member of AL QAEDA, and Sheikh Ahmed Salim Swedan purchased a 1987 Nissan Atlas truck ("the Dar es Salaam bomb truck") in Dar es Salaam, Tanzania.

328. In or about July 1998, Sheikh Ahmed Salim Swedan arranged for mechanical and welding work to be done on the Dar es Salaam bomb truck at various locations in Dar es Salaam, Tanzania.

329. In or about July 1998, Sheikh Ahmed Salim Swedan purchased two large truck batteries from a location in Dar es Salaam, Tanzania.

330. In or about July 1998, Ahmed Khalfan Ghailani and Fahid Ali Msalam purchased oxygen and acetylene tanks in Dar es Salaam, Tanzania.

331. On or about July 31, 1998, MOHAMED RASHED DAOUD AL-'OWHALI, using a passport in the alias "Khaled Salem Saleh Bin Rashed," traveled from Karachi, Pakistan, to Nairobi, Kenya, arriving on August 2, 1998.

332. In or about late July 1998, in Dar es Salaam, Tanzania, KHALFAN KHAMIS MOHAMED, Mustafa Mohamed Fadhil, and others, participated in the grinding of TNT.

333. During the last week of July and the first week of August 1998, Mustafa Mohamed Fadhil, KHALFAN KHAMIS MOHAMED, and Fahid Ali Msalam met at the residence located at house 213 in the Ilala District of Dar es Salaam, Tanzania, to make final preparations for the bombing of the U.S. Embassy in Dar es Salaam, Tanzania.

334. In or about late July or early August 1998, Mustafa Mohamed Fahil, KHALFAN KHAMIS MOHAMED, Fahid Ali Msalam, and Ahmed Khalfan Ghailani loaded boxes of TNT, gas cylinder tanks, batteries, detonators, fertilizer, and sand bags into the back of the Dar es Salaam bomb truck.

335. On or about August 1, 1998, Abdullah Ahmed Abdullah, a member of AL QAEDA, advised MOHAMED SADEEK ODEH that all members of AL QAEDA had to leave Kenya by Thursday, August 6, 1998.

336. In or about early August 1998, Abdullah Ahmed Abdullah and MOHAMED SADEEK ODEH traveled from Mombasa, Kenya, to Nairobi, Kenya.

337. During the first week of August 1998, Abdullah Ahmed Abdullah, Fazul Abdullah Mohammed and MOHAMED RASHED DAOUD AL-'OWHALI, together with "Azzam" and other members of AL QAEDA, met at the villa located at number 43 New Runda Estates in Nairobi, Kenya, to make final preparations for the bombing of the U.S. Embassy at Nairobi, Kenya.

338. On or about August 1, 1998, Ahmed Khalfan Ghailani checked into the Hilltop Hotel in Nairobi, Kenya. On or about August 2, 1998, MOHAMMED SADEEK ODEH and Fazul Abdullah Mohammed, together with other members of AL QAEDA, met at the Hilltop Hotel in Nairobi, Kenya.

339. On or about August 2, 1998, Sheikh Ahmed Salim Swedan and Mustafa Mohamed Fadhil left Nairobi, Kenya, for Karachi, Pakistan.

340. On or about August 3, 1998, Fahid Ali Msalam purchased air travel tickets to Pakistan for himself and MOHAMED SADEEK ODEH.

341. On or about August 4, 1998, Abdullah Ahmed Abdullah, Fazul Abdullah Mohammed and MOHAMED RASHED DAOUD AL-'OWHALI, together with "Azzam" and other members of AL QAEDA, reconnoitered the U.S. Embassy in Nairobi, Kenya.

342. On or about August 6, 1998, Abdullah Ahmed Abdullah and Ahmed Khalfan Ghailani left Nairobi, Kenya, for Karachi, Pakistan.

343. On or about August 6, 1998, MOHAMED SADEEK ODEH and Fahid Ali Msalam left Nairobi, Kenya, for Karachi, Pakistan.

E. The bombing at the U.S. Embassy in Nairobi, Kenya:

344. On August 7, 1998, at approximately 9:30 a.m. local time, Fazul Abdullah Mohammed drove a pick-up truck from the villa located at 43 New Runda Estates to the vicinity of the U.S. Embassy in Nairobi, Kenya. Meanwhile, MOHAMED RASHED DAOUD AL-'OWHALI rode in the Nairobi Bomb Truck driven by "Azzam" (a Saudi national) containing a large bomb to the U.S. Embassy in Nairobi, Kenya. MOHAMED RASHED DAOUD AL-'OWHALI possessed four stun-type grenades, a handgun, bullets, and keys to the padlocks on the Nairobi bomb truck.

345. On August 7, 1998, at approximately 10:30 a.m., MOHAMED RASHED DAOUD AL-'OWHALI got out of the Nairobi bomb truck as it approached the rear of the U.S. Embassy building and threw a stun grenade in the direction of a security guard before attempting to flee.

346. On August 7, 1998, at approximately 10:30 a.m., "Azzam" drove the Nairobi bomb truck to the rear of the U.S. Embassy building and fired a handgun at the windows of the Embassy building.

347. On August 7, 1998, at approximately 10:30 a.m., "Azzam" detonated the explosive device contained in the Nairobi bomb truck at a location near the rear of the Embassy building, demolishing a multi-story secretarial college and severely damaging the U.S. Embassy building and the Cooperative Bank Building, causing a total of more than 213 deaths, as well as injuries to more than 4,500 people, including Plaintiffs.

F. The bombing at the U.S. Embassy in Dar es Salaam, Tanzania:

348. In or about March 1998, al Qaeda operatives Khalfan Khamis Mohamed ("Khalfan") and Mustafa Mohamed Fadhil ("Fadhil") met in Dar Es Salaam, Tanzania and agreed to participate in a "jihad job".

349. On or about May 4, 1998, Khalfan applied for a Tanzanian passport in the name of Zahran Nassor Maulid.

350. In June 1998, Khalfan and Fahid Mohammed Ally Msalam ("Msalam") purchased a white Suzuki Samurai at a location in Dar es Salaam and rented a house in the Ilala District of Dar es Salaam, Tanzania.

351. Throughout the summer of 1998, Fadhil, Khalafan, Msalam and Ahmed Khalfan Ghailani (“Ghailani”) met at a residence on Amani Street in Dar es Salaam to discuss the bombing of the United States Embassy in Tanzania.

352. In or about July 1998, Ghailani and Ahmed Salim Swedan (“Swedan”) purchased a 1987 Nissan Atlas truck in Dar es Salaam, Tanzania, arranged for mechanical and welding work on the truck, and purchased two large truck batteries, oxygen, and acetylene tanks.

353. In July 1998, Mohamed Sadeek Odeh (“Odeh”) was advised by Ahmed Mohamed Hamed Ali (“Ali”) that Bin Laden had formed a united front against the United States with other Islamic extremist groups.

354. Prior to August 2, 1998, Abdullah Ahmed Abdullah (“Abdullah”) provided Odeh with a false passport to facilitate his travel to Afghanistan for the purpose of meeting with Bin Laden and other al Qaeda operatives.

355. During the last week of July and first week of 1998, Fadhil, Khalfan, Msalam and another operative known as “Ahmed the German” met at a residence in the Ilala District of Dar es Salaam to make final preparations for the bombing of the United States Embassy in Tanzania.

356. In July or August 1998, Khalfan, Msalam, Ghailani, Fadhil, and others loaded boxes of TNT, cylinder tanks, batteries, detonators, fertilizer and sand bags into the back of the 1987 Nissan Atlas Truck.

357. On or about August 7, 1998, KHALFAN KHAMIS MOHAMED accompanied “Ahmed the German” (an Egyptian national) in the Dar es Salaam Bomb Truck during a portion of the ride to the U.S. Embassy.

358. At approximately 10:40 a.m. on August 7, 1998, “Ahmed the German” detonated an explosive device located within the 1987 Nissan Atlas in the vicinity of the United States

Embassy in Dar es Salaam, Tanzania. The explosion severely damaged the United States Embassy and resulted in the death of at least 11 persons and injured at least 85.

359. Plaintiffs' and/or Plaintiffs' decedents' deaths and injuries were caused by a willful and deliberate act of terror by al Qaeda, acting under direct and indirect sponsorship and/or direction, and with the direct material support and resources of the Defendants.

360. In the early hours, prior to the bombing, facsimiles were sent to London, England, claiming responsibility for the embassy bombings in the name of the "Islamic Army for the Liberation of the Holy Places", which claimed that the Dar es Salaam bombing was carried out by an Egyptian national.

361. Khalfan, Fadhil, Msalam, Ali, Ghailani, Swedan, and Ahmed the German were members of al Qaeda and perpetrated the bombing of the United States Embassy in Dar es Salaam, Tanzania at the direction of and/or on behalf of al Qaeda. Throughout August 7, 2008 and August 8, 2008, two al Qaeda operatives, Adel Abdel Bary ("Bary") and Ibrahim Eidaous ("Eidaous"), participated in the dissemination of claims of responsibility for the bombings of the United States Embassies in Dar es Salaam.

362. The actions of the agents and co-conspirators of the Defendants, and those who were substantially aided and abetted by Defendants, as set forth above, inflicted mental distress upon the families of the Plaintiffs. The material support rendered to co-conspirators of the Defendants, and those who were substantially aided and abetted by Defendants, fits within the definition of material support as described by 18 U.S.C. § 2339 (A).

363. The formation of Hezbollah and its emergence as a terrorist organization was the product of direct intervention by Iranian operatives, including the Iranian Revolutionary Guards, the Quds Force and the Iranian Ministry of Information. Al Qaeda was financed, technologically

supported and/or commanded by Iranian military and intelligence operatives, including Hezbollah.

CAUSES OF ACTION

COUNT I

CLAIM OF PLAINTIFFS 1, 2, 75, 79 and 228

WRONGFUL DEATH

(Under 28 U.S.C. § 1605A(c))

364. Plaintiffs incorporate by reference the averments in the preceding paragraphs as though fully set forth at length.

365. CAROLINE SETLA OPTI and SALLY CECELIA MAMBLEO who died at the U.S. Embassy at Nairobi, Kenya, are survived by family members who are entitled to recover damages from all Defendants for wrongful death. These family members are entitled to damages resulting from the deaths of the Decedents caused by the actions of the Defendants.

366. As a further result of intentional and reckless acts, omissions, and other tortious conduct of the Defendants, Plaintiffs have been caused to expend various sums to raise the estates of Decedents and have incurred other expenses for which they are entitled to recover.

COUNT II

CLAIM OF PLAINTIFFS 5, 11, 17, 19, 20, 23, 26, 79, 81, 84, 85, 97, 110, 113, 119, 126, 130, 132, 136, 140, 150, 154, 165, 170, 231, 247, 248, 249, 261, 266 and 270

LOSS OF CONSORTIUM

(Under 28 U.S.C. § 1605A(c), U.S. state common or statutory law, Kenyan common law and Tanzanian common law)

367. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

368. As a further and direct proximate result of the acts of the Defendants, the enumerated Plaintiffs, as the spouses of the decedents and/or the surviving injured Plaintiffs, were caused to sustain a loss of services, comfort, society, and attentions in the past and future and suffered a loss of consortium to the detriment of the marital relationship and have suffered damages.

COUNT III

CLAIM OF PLAINTIFFS 6, 8, 9, 10, 12, 13, 14, 15, 16, 18, 20, 21, 22, 24, 25, 27, 28, 30, 31, 32, 33, 34, 35, 36 through 46, 74, 78, 80, 82, 83, 84, 85, 114, 240, 260 and 271

ASSAULT AND BATTERY

(Under 28 U.S.C. § 1605A(c), Kenyan common law, Tanzanian common law, and U.S. state common or statutory law)

369. On Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

370. The actions of the defendants caused and led directly to the 1998 bombings, their bombing of the embassies intentionally and willfully put the surviving plaintiffs, and the decedents prior to their deaths, in fear for their lives and apprehension of harm and injury as a direct result of fear of imminent death or mutilation.

371. The explosion was intended to cause harmful contact with the plaintiffs and decedents, and in fact caused such contact, at the bomb sites and put them in reasonable apprehension of imminent battery. These injuries were caused by a willful and deliberate act of persons who had been materially assisted by Defendants for the purpose of inflicting physical injuries upon the Plaintiffs and others and by so doing to intimidate the United States, and to cause its withdrawal from the Near East and Africa. Those persons were at all times acting with the material support of the Defendants and with the concurrence of the Defendants, the Islamic

Republic of Iran, the Iranian Ministry of Information and Security, the Republic of the Sudan and the Ministry of the Interior of the Republic of the Sudan.

372. The personal injuries and losses suffered by the surviving Plaintiffs and decedents, and the consequences resulting therefrom, were proximately caused by the intentional and reckless acts, omissions, and other tortious conduct of all Defendants as described herein.

COUNT IV

CLAIM OF PLAINTIFFS 1, 2, 4, 75, 79, 228 and 265

SURVIVAL

(Under 28 U.S.C. § 1605A(c), U.S. state common or statutory law, Kenyan statutory or common law)

373. On Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

374. Plaintiffs bring this action for damages suffered by the estates of CAROLINE SETLA OPTI and SALLY CECELIA MAMBLEO as a result of their deaths, including their pain and suffering, inconvenience, loss of life and life's pleasures, loss of earnings and earning capacity, and other items of damages.

375. As a result of the Defendants' wrongful conduct, Plaintiffs suffered damages as fully set forth in the paragraphs above which are incorporated herein by reference.

COUNT V

CLAIM OF PLAINTIFFS 1 through 282

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS OR SOLATIUM

(under 28 U.S.C. § 1605A(c), Kenyan common law, Tanzanian common law, and U.S. state common law)

376. On Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

377. All Defendants knew that U.S. Embassy bombings would kill or injure the innocent United States Plaintiffs and foreign Plaintiffs at their place of work, leaving family members to grieve for their losses.

378. As a direct and intended consequence of the intentional and reckless actions of the Defendants, conduct that is intolerable in a civilized society, the Defendants, their co-conspirators and those who were substantially aided and abetted by Defendants who carried out the attacks above alleged, caused the surviving Plaintiffs, and the decedents prior to their deaths, severe mental distress, which has required continuing treatment, which will continue for the balance of the Plaintiffs' lives, and they have thereby suffered damages

379. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered and will forever in the future suffer severe and permanent emotional distress and anxiety, permanent psychological distress and permanent mental impairment.

380. The conduct of all Defendants was undertaken in an intentional manner to murder or injure the Plaintiffs and to cause the contemporaneous and permanent emotional suffering of the heirs of the murdered victims.

381. As a direct and proximate result of the deaths of the Decedents, their heirs have been deprived of loss of society, future aid, assistance, services, comfort, and financial support.

382. As a direct and proximate result of the Defendants' cowardly, barbaric and outrageous acts of murder, the heirs of the Decedents will forever grieve their deaths.

383. The Defendants, by engaging in this unlawful conduct, recklessly and/or intentionally inflicted severe emotional distress upon the Plaintiffs.

COUNT VI

CLAIM OF PLAINTIFFS 1 through 282

AIDING AND ABETTING

(under 28 U.S.C. § 1605A(c), Kenyan common law, Tanzanian common law, and US state common law)

384. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

385. Defendants did knowingly and willfully provide substantial assistance to the terrorists and the terrorist organization that willfully and deliberately committed the two embassy bombings, which caused the injuries, and/or deaths of the plaintiffs. All Defendants were aware of the goals of Al Qaeda and were aware or should have been aware that the aid and assistance furnished to Al Qaeda would aid and abet Al Qaeda's terrorist activities, including the two US embassy bombings.

386. For the reasons stated above, and having aided and abetted a terrorist organization which willfully and deliberately committed an act of terrorism which caused the injuries and/or death of the plaintiffs, all defendants are jointly and severally liable to plaintiffs for all damages in this civil action.

COUNT VII

CLAIM OF PLAINTIFFS 1 through 282

CIVIL CONSPIRACY

(under 28 U.S.C. § 1605A(c), Kenyan common law, Tanzanian common law, and US state common law)

387. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

388. As set forth more fully above, all Defendants, known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed, tacitly and/or expressly, to kill, severely injure, and/or inflict personal injuries upon the Plaintiffs and the Plaintiffs decedents.

389. As set forth above, all Defendants conspired and agreed to provide material support and resources to AL QAEDA, and the bombers in furtherance of Al Qaeda's overall goal to kill or injure American citizens and other persons present or employed at the U.S. Embassies in Nairobi, Kenya, and in Dar es Salaam, Tanzania.

390. The Defendants' conspiracy resulted in the August 7, 1998 Embassy attacks that killed, severely injured, and/or inflicted personal injuries upon the Plaintiffs and Plaintiffs decedents.

391. As a result of the Defendants' conspiracy, Plaintiffs suffered damages as fully set forth in the paragraphs above which are incorporated herein by reference.

COUNT VIII

CLAIM OF PLAINTIFFS 1 through 282

PUNITIVE DAMAGES

(under 28 U.S.C. § 1605A(c))

392. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

393. As set forth more fully above, all Defendants, known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed, tacitly and/or expressly,

to kill, severely injure, and/or inflict personal injuries upon the Plaintiffs and the Plaintiffs decedents.

394. As set forth above, all Defendants conspired and agreed to provide material support and resources to AL QAEDA, and the bombers in furtherance of Al Qaeda's overall goal to kill or injure American citizens and other persons present or employed at the U.S. Embassies in Nairobi, Kenya, and in Dar es Salaam, Tanzania.

395. The Defendants' conspiracy resulted in the August 7, 1998 Embassy attacks that killed, severely injured, and/or inflicted personal injuries upon the Plaintiffs and the Plaintiffs decedents.

396. Defendants' outrageous actions can not be tolerated by a civilized society and deserves the harshest condemnation of our ordered legal system.

397. As a result of the Defendants' conspiracy, Plaintiffs suffered damages as fully set forth in the paragraphs above which are incorporated herein by reference.

DAMAGES

398. As a direct and proximate result of the intentional, willful, reckless, and careless actions of the Defendants, Plaintiffs have suffered severe and permanent personal injuries, damages, and losses, including the following:

- (a) the severe mental anguish suffered by Plaintiffs;
- (b) the severe pain and suffering suffered by Plaintiffs;
- (c) the inability of Plaintiffs to perform the usual household and personal activities that they normally would have performed through the remainder of their natural life expectancies;
- (d) loss of Plaintiffs' and Decedents' earnings and future earning potential;

- (e) loss of Plaintiffs' and Decedents' lives and life's pleasures;
- (f) costs relating to managing the estates of Decedents; and
- (g) death of the Decedents by way of murder as a result of the Defendants' conduct and that of their co-conspirators; and
- (h) Economic damages, solatium, pain and suffering, and punitive damages under 28 U.S.C. § 1605A(c).

399. The aforementioned personal injuries, death and losses incurred by the Plaintiffs were caused by the intentional outrageous acts, recklessness, and carelessness of all Defendants, acting individually and in concert, as well as other co-conspirators not yet identified, and of their agents, servants and/or employees acting within and during the course and scope of their employment, authority, or apparent authority.

400. These aggravating circumstances also justify the award of exemplary damages to the non-US national Plaintiffs under Kenyan law.

401. Plaintiffs demand judgment in their favor in general damages against all Defendants, jointly, severally, and *in solido*, in an amount in excess of One Billion (\$1,000,000,000) Dollars.

402. Plaintiffs also request an award of legal interest, costs, and such other relief as this Honorable Court deems appropriate.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court grant judgment in their favor and against the Defendants, jointly, severally, and *in solido* on Counts One through Eight, and grant to Plaintiffs:

- Compensatory and punitive damages in favor of Plaintiffs and against Defendants jointly, severally, and *in solido*, in the amounts demanded in this Complaint for Damages;
- Prejudgment interest or other appropriate interest;
- Costs and expenses;
- Attorney's fees; and
- Such other and further relief as this Honorable Court may determine to be just and appropriate under the circumstances.

Respectfully submitted this 18th day of October, 2013.

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