

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

-----X
ETHEL HURST, et al.,

Plaintiffs,

-against-

THE SOCIALIST PEOPLE'S LIBYAN ARAB
JAMAHIRIYA, et al,

Defendants.
-----X

02 Civ. 2147 (HHK)

**MOTION FOR PARTIAL
SUMMARY JUDGMENT
AGAINST DEFENDANT
ALI AL-MEGRAHI**

Pursuant to LcvR 7 and Fed. R. Civ. P. 56, Plaintiffs hereby move the Court for summary judgment with respect to liability in favor of Plaintiffs and against Defendant Abdel-Basset Ali Al-Megrahi (“Al-Megrahi”). This motion is based on the doctrine of collateral estoppel as a result of the criminal conviction of Megrahi on 270 counts of murder by the Scottish High Court of Justiciary on January 31, 2001, for his role in the bombing of Pan American Airlines Flight 103.

Respectfully submitted,

EMERY CELLI BRINCKERHOFF & ABADY LLP

_____/s/_____
Richard D. Emery (RE 5181)
Sarah Netburn (SN 4223)
545 Madison Avenue
New York, NY 10022
(212) 763-5000

MARK S. ZAID, P.C.
Mark S. Zaid (DC Bar # 440532)
1920 N Street, N.W., Suite 300
Washington, D.C. 20036
(202) 454-2809