

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIATALAL AL-ZAHRANI, *et al.*,

Plaintiffs,

v.

DONALD RUMSFELD, *et al.*

and

UNITED STATES,

Defendants.

Case No. 09-cv-00028 (ESH)

NOTICE OF ERRATA

Plaintiffs, by and through their counsel, respectfully submit an errata to correct inadvertent omissions and errors in Plaintiffs' Memorandum in Opposition to Individual Defendants' and United States' Motions to Dismiss and United States' Motion to Substitute, as filed on October 5, 2009 (Dkt. No. 19).

First, Plaintiffs submit a Table of Authorities. They additionally submit their administrative claims under the Federal Tort Claims Act, which they referenced as Exhibits A and B on pages 79 and 81 of their Memorandum, but inadvertently failed to attach.

Second, Plaintiffs submit the following corrections:

- On page 11, note 11, the sentence as corrected is, "That clause vests federal judicial power conjunctively in the Supreme Court and 'such inferior Courts as the Congress may from time to time ordain and establish.'" Plaintiffs omitted the underlined phrase.
- On page 45, Plaintiffs omitted a citation in the first full paragraph following the sentence, "Plaintiffs allege that he and other individual Defendants knew or should have known that Plaintiffs faced serious risks of harm, but failed to adequately protect

them.” The correct citation is to paragraphs 80, 98 and 159 of Plaintiffs’ Amended Complaint.

- On page 47, in the first paragraph, the correct citation following the sentence, “Plaintiffs allege that Messrs. Al-Zahrani and Al-Salami were subjected to methods of physical and psychological torture that were approved by Defendants including Rumsfeld for use in connection with their interrogations in Guantanamo,” is to paragraphs 61, 93-94, and 136-137 of Plaintiffs’ Amended Complaint.
- On page 47, Plaintiffs omitted a citation in the second paragraph following the sentence, “The SOPs implemented Department of Defense policy.” The correct citation is to paragraph 60 of Plaintiffs’ Amended Complaint.
- On page 59, note 52, Plaintiffs omitted the full citation to an article cited at the end of the footnote. The correct citation is “Jordan J. Paust, *Civil Liability of Bush, Cheney et al. for Torture, Cruel, Inhumane, and Degrading Treatment and Forced Disappearance* (Sep. 14, 2009), available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1458638.”
- Plaintiffs submit additional minor miscellaneous corrections, including replacing “Plaintiffs” with “Decedents” in several areas of the Memorandum to eliminate ambiguity.

Plaintiffs submit a corrected Memorandum incorporating the above additions and corrections as Exhibit 1, and a blackline copy of the corrected Memorandum as Exhibit 2.

Counsel for Plaintiffs apologize for the errors.

Dated: October 8, 2009
New York, NY

Respectfully submitted,

/s/ Pardiss Kebriaei
Pardiss Kebriaei (pursuant to LCvR 83.2(g))
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