

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.

Plaintiffs,

v.

04-cv-00397-GBD

THE PALESTINE LIBERATION ORGANIZATION, et al.

Defendants.

**ERRATA SHEET**

**Memorandum in Support of Plaintiffs' Motion for Summary Denial of Defendants' Motion  
to Dismiss for Lack of Personal Jurisdiction, or, in the Alternative, for Jurisdictional  
Discovery and for Related Relief**

In the third paragraph on page 2 of plaintiffs' Memorandum, the phrase "and/or on the basis of collateral estoppel" should be stricken.<sup>1</sup>

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<sup>1</sup> This phrase was inadvertently carried over from an earlier draft of the Memorandum.

Because defendants' motion to dismiss for lack of personal jurisdiction is barred at the threshold under Fed.R.Civ.P. 12(h)(1), plaintiffs' instant motion to summarily deny defendants' motion is made solely on that ground. If defendants' motion is not summarily denied – i.e. if the issue of defendants' minimum contacts is litigated in this action – plaintiffs' reserve the right to assert that the defendants are collaterally estopped from contesting relevant factual findings and legal holdings made in *Ungar v. Palestinian Authority* and in *Biton v. Palestinian Interim Self-Government Authority*.

Plaintiffs, by their Attorneys,

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I here by certify that this pleading was sent via ECF on September 24, 2007 to the following counsel of record:

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