

Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe emotional distress as set forth above.

255. Each of the plaintiffs set forth in the preceding paragraph suffered severe emotional distress and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

256. Under state common and statutory law, each plaintiff asserts this cause of action.

COUNT XVIII

CLAIM FOR PERSONAL INJURY

(State common and statutory law)

257. Paragraphs 1 through 256 are incorporated herein as if fully set forth.

258. As a direct and proximate result of defendants' actions, as set forth above, Kenneth Terence Ford, James E. Goins, Troy Deon Euring, Gerald Ford, Richard George, Alfred Jackson, David Jackson, Larry Jefferson, Dalton E.

Porteous, Anthony Sailor, Robert Lee Sims, Henry Carl Smith, Melvin Spencer, Romana Wells, Tyrell White, Anthony Bernard Ballard, Donna Marie DaGraca, Christopher A. Gordon-Somers, Wade McArthur Harris, Jr., Ralph Hunter, Alex L. Jackson, Earl Thomas Marshall, Sr., Frank Wesley McGee, Jr., Clarence Rambo, Forrest Ward, Thomas Leon Woodland, Jeffrey Wynes, Carlos Marquez, Andre W. Woodson, Ruthlyn Resha Baxter, Brandon Borders, Rickey Eugene Borders, Lee Robert Brown, III, Shawn Butler, Darryl Allen Byers, Jordan Edwards, James Earl Frazier, Michaela Haugabook, Timothy Glen Henderson, Charlie Chris Hill, Roosevelt Johnson, Robert Eugene Jones, Ronald Jones, Gary Lungrin, Charles J. Maxwell, James Winfield May, Paul Andrew McCathron, Andre McGhee, Delionel B. Meadows, Manuel Anthony Medina, Bryan Mills, Lynn Arnett Morgan, Wayne P. Neeley, Miguel H. Spruill, Ronald Tate, Alvin Levert Wallace, Robert Weldon, Lloyd Elliot Wells, Earnest Eugene Wilson, and Marshaun A. R. Winston suffered severe personal injuries as set forth above.

259. Each of the plaintiffs set forth in the preceding paragraph suffered personal injuries and these plaintiffs are entitled to receive the full range of money damages, including economic damages and damages for pain and suffering, established by law.

260. Under state common and statutory law, each plaintiff asserts this cause of action.

COUNT XIX

ACTION FOR WRONGFUL DEATH

Claim Of Robert Lee Beecham

Personal Representative of the Estate of Kenneth Ford v. Libya

(16 District of Columbia Code, Section 16-2701, et seq.)

261. Plaintiff, Robert Lee Beecham, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

262. As a direct and proximate result of the intentional acts carried out with and by the material support of the Defendants, Libya and JSO, Decedent, Kenneth Ford, was caused to suffer severe, multiple physical injuries from which he expired, and the beneficiaries under the Wrongful Death Act of the District of Columbia, Robert Lee Beecham and others, have suffered the loss of future financial support by the Decedent, as well as gifts and other contributions which they might reasonably have expected to receive during his lifetime, and the estate of the Decedent has thereby been diminished.

WHEREFORE, Plaintiff, Robert Lee Beecham, Personal Representative of the Estate of Kenneth Ford, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and Jamahiriya Security Organization, jointly and severally, on behalf of the beneficiaries under the District of Columbia Wrongful Death Act, 16 District of Columbia Code, Section 16-2701 in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XX

SURVIVAL

Claim Of Robert Lee Beecham

Personal Representative of the Estate of Kenneth Ford v. Libya

(12 District of Columbia Code, Section 12-101, et seq.)

263. Plaintiff repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

264. The Decedent, Kenneth Ford, suffered multiple injuries in the occurrence described above, resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges and funeral expenses and the amounts which Decedent would have earned over his lifetime thus diminishing his estate. The Estate of Kenneth Ford has thereby suffered damages in the amount of \$ 5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Robert Lee Beecham, Personal Representative of the Estate of Kenneth Ford, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and Jamahiriya Security Organization (JSO), jointly and severally, on behalf of the beneficiaries under the District of Columbia Wrongful Death Act, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXI

Claim Of Robert Lee Beecham

Personal Representative of the Estate of Kenneth Ford v. Libya

Solatium and Intentional Infliction of Mental Distress

(Under state common and statutory law)

265. Plaintiff repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

266. The acts of the agents of Libya and JSO, as set forth above, constituted extreme and outrageous conduct with the intent to inflict emotional distress upon members of the family of Kenneth Ford and by virtue of his death said persons have suffered severe emotional distress and are thereby entitled to solatium. The acts of the agents of Libya were funded and directed by Libya, which is thereby vicariously liable.

WHEREFORE, Plaintiff, Robert Lee Beecham, Personal Representative of the Estate of Kenneth Ford, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and Jamahiriya Security Organization (JSO), jointly and severally, on behalf of the beneficiaries under the District of Columbia Wrongful Death Act, each beneficiary in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXII

Claim of J.C. Andrews for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

267. Plaintiff, J.C. Andrews repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

268. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, J.C. Andrews, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$ 5,000,000.00, besides costs.

WHEREFORE, Plaintiff, J.C. Andrews demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXIII

Claim of Ann Marie Arnicar for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

269. Plaintiff, Ann Marie Arnicar, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

270. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Ann Marie Arnicar, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment,

suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and she has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Ann Marie Amicar, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXIV

Claim of Tracy Billingslea for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

271. Plaintiff, Tracy Billingslea, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

272. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Tracy Billingslea, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Tracy Billingslea, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXV

Claim of Reginald Borders for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

273. Plaintiff, Reginald Borders, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

274. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Reginald Borders, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$ 5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Reginald Borders, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXVI

Claim of Gerald Clark for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

275. Plaintiff, Gerald Clark, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

276. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Gerald Clark, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Gerald Clark, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXVII

Claim of Allen Cones for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

277. Plaintiff, Allen Cones, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

278. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Allen Cones, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Allen Cones, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXVIII

Claim of LeRoy Craig for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

279. Plaintiff, LeRoy Craig, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

280. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, LeRoy Craig, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital

and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$ 5,000,000.00, besides costs.

WHEREFORE, Plaintiff, LeRoy Craig, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXIX

Claim of Gary Damon for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

281. Plaintiff, Gary Damon, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

282. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Gary Damon, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Gary Damon, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXX

Claim of Stacy Demps for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

283. Plaintiff, Stacy Demps, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

284. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Stacy Demps, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and she has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Stacy Demps, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXI

Claim of Terry Finch for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

285. Plaintiff, Terry Finch, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

286. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Terry Finch, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Terry Finch, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXII

Claim of William Gilmore for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

287. Plaintiff, William Gilmore, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

288. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, William Gilmore, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, William Gilmore, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXIII

Claim of Jeremy Hall for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

289. Plaintiff, Jeremy Hall, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

290. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Jeremy Hall, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital

and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Jeremy Hall, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXIV

Claim of Donald Ham for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

291. Plaintiff, Donald Ham, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

292. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Donald Ham, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Donald Ham, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXV

Claim of Ralph Hunter for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

293. Plaintiff, Ralph Hunter, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

294. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Ralph Hunter, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Ralph Hunter, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXVI

Claim of Alex L. Jackson for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

295. Plaintiff, Alex L. Jackson, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

296. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Alex L. Jackson, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Alex L. Jackson, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXVII

Claim of David T. Jackson for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

297. Plaintiff, David T. Jackson, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

298. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, David T. Jackson, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, David T. Jackson, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXVIII

Claim of John Jackson for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

299. Plaintiff, John Jackson, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

300. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, John Jackson, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital

and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, John Jackson, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XXXIX

Claim of Alan Lee for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

301. Plaintiff, Alan Lee, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

302. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Alan Lee, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Alan Lee, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XL

Claim of Ron Locke for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

303. Plaintiff, Ron Locke, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

304. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Ron Locke, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Ron Locke, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLI

Claim of Earle Marshall for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

305. Plaintiff, Earle Marshall, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

306. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Earle Marshall, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Earle Marshall, demands judgment against Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLII

Claim of Frank McDougald for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

307. Plaintiff, Frank McDougald, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

308. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Frank McDougald, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Frank McDougald, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLIII

Claim of Ulysses Mays for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

309. Plaintiff, Ulysses Mays, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

310. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Ulysses Mays, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital

and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Ulysses Mays, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLIV

Claim of Larry Northington for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

311. Plaintiff, Larry Northington, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

312. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Larry Northington, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Larry Northington, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLV

Claim of Michael O'Neal for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

313. Plaintiff, Michael O'Neal, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

314. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Michael O'Neal, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Michael O'Neal, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLVI

Claim of Patrick Pettway for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

315. Plaintiff, Patrick Pettway, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

316. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Patrick Pettway, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Patrick Pettway, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLVII

Claim of Marvin Ragin for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

317. Plaintiff, Marvin Ragin, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

318. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Marvin Ragin, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Marvin Ragin, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLVIII

Claim of Ernest Rios for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

319. Plaintiff, Ernest Rios, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

320. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Ernest Rios, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital

and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Ernest Rios, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT XLIX

Claim of Larry Ruff for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

321. Plaintiff, Larry Ruff, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

322. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Larry Ruff, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Larry Ruff, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT L

Claim of Charles Staples for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

323. Plaintiff, Charles Staples, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

324. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Charles Staples, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Charles Staples, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LI

Claim of Jeffery Sutton for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

325. Plaintiff, Jeffery Sutton, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

326. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Jeffery Sutton, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Jeffery Sutton, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LII

Claim of Ricky Tucker for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

327. Plaintiff, Ricky Tucker, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

328. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Ricky Tucker, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Ricky Tucker, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LIII

Claim of Curtis Williams for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

329. Plaintiff, Curtis Williams, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

330. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Curtis Williams, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital

and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Curtis Williams, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LIV

Claim of Michael Williams for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

331. Plaintiff, Michael Williams, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

332. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Michael Williams, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Michael Williams, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LV

Claim of Cedric Woolfork for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

333. Plaintiff, Cedric Woolfork, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

334. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Cedric Woolfork, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Cedric Woolfork, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LVI

Claim of James Ziegler for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

335. Plaintiff, James Ziegler, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

336. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, James Ziegler, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, James Ziegler, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

COUNT LVII

Claim Of Tessie L. Brown, Individually And As

Personal Representative Of The Estate Of Edward Mac Goins

For Solatium And Intentional Infliction Of Mental Distress

(Under state common and statutory law)

337. Plaintiff repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

338. The acts of the agents of Libya and JSO, in carrying out the attack as above set forth resulted in the death of James Goins. Such actions constituted extreme and outrageous conduct which was undertaken with the intent to inflict emotional distress upon members of the family of James Goins and by virtue of his death, his father, Edward Mac Goins, now deceased, and his aunt, Tessie L. Brown, have suffered severe emotional distress and are thereby entitled to solatium. The acts of the agents of Libya and the JSO were funded and directed by Libya and the JSO which are thereby vicariously liable as entities rendering material support to terrorist actions.

WHEREFORE, Plaintiff, Tessie L. Brown, Individually and as Personal Representative of the Estate of Edward Mac Goins, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and Jamahiriya Security Organization (JSO), jointly and severally, on behalf of herself and on behalf of the Estate of Edward Mac Goins, each in the amount of TEN MILLION DOLLARS (\$10,000,000.00), plus costs.

COUNT LVIII

Claim of Robert Lee Jones for Personal Injury

Assault and Intentional Infliction of Mental Distress

(Under state common and statutory law)

339. Plaintiff, Robert Lee Jones, repeats and re-alleges each and every allegation set forth above with like effect as if alleged herein.

340. As a direct and proximate consequence of the actions of the Defendants, as aforesaid, Plaintiff, Robert Lee Jones, suffered multiple injuries resulting in pain, suffering and pecuniary loss which includes medical, hospital and physicians charges, was required to undergo extensive medical treatment, suffered a loss of earnings and a loss of future earnings, suffered permanent injury including partial loss of hearing, suffered severe mental and emotional distress and he has thereby suffered damages in the amount of \$5,000,000.00, besides costs.

WHEREFORE, Plaintiff, Robert Lee Jones, demands judgment against the Defendants, Socialist People's Libyan Arab Jamahiriya (Libya) and the Jamahiriya Security Organization (JSO), jointly and severally, in the amount of FIVE MILLION DOLLARS (\$5,000,000.00), plus costs.

PRAYERS FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court grant Plaintiffs judgment in their favor and against all Defendants, jointly and severally, and grant:

A. Plaintiffs Robert Lee Beecham and Alice Faye Ford, on behalf of the Estate of Kenneth Terence Ford, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$20,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

B. Plaintiff Robert Lee Beecham, individually, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

C. Plaintiff Alice Faye Ford, individually, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

D. Plaintiff Revell Scott, individually, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

E. Plaintiffs Robert Lee Beecham and Alice Faye Ford, on behalf of the Estate of Robin L. Beecham, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

F. Plaintiff Patrocinia Goins, on behalf of the Estate of James E. Goins, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$20,000,000; reasonable costs and expenses; reasonable

attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

G. Plaintiff Patrocinia Goins, individually, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

H. Plaintiff Carlos Goins, individually, compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

I. Plaintiff Troy Deon Euring compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

J. Plaintiff Gerald Ford compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

K. Plaintiff Richard George compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000;

reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

L. Plaintiff Alfred Jackson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

M. Plaintiff David Jackson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

N. Plaintiff Larry Jefferson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

O. Plaintiff Dalton E. Porteous compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

P. Plaintiff Anthony Sailor compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

Q. Plaintiff Robert Lee Sims compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

R. Plaintiff Henry Carl Smith compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

S. Plaintiff Melvin Spencer compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

T. Plaintiff Romana Wells compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and

further relief which the Court may determine to be just and equitable under the circumstances.

U. Plaintiff Tyrell White compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

V. Plaintiff Anthony Bernard Ballard compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

W. Plaintiff Donna Marie DaGraca compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

X. Plaintiff Christopher A. Gordon-Somers compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

Y. Plaintiff Wade McArthur Harris, Jr. compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000;

reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

Z. Plaintiff Ralph Hunter compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

AA. Plaintiff Alex L. Jackson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

BB. Plaintiff Earl Thomas Marshall, Sr. compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

CC. Plaintiff Frank Wesley McGee, Jr. compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

DD. Plaintiff Clarence Rambo compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

EE. Plaintiff Forrest Ward compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

FF. Plaintiff Thomas Leon Woodland compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

GG. Plaintiff Jeffrey Wynes compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

HH. Plaintiff Carlos Marquez compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and

further relief which the Court may determine to be just and equitable under the circumstances.

II. Plaintiff Andre W. Woodson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

JJ. Plaintiff Ruthlyn Resha Baxter compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

KK. Plaintiff Brandon Borders compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

LL. Plaintiff Rickey Eugene Borders compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

MM. Plaintiff Lee Robert Brown, III compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

NN. Plaintiff Shawn Butler compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

OO. Plaintiff Darryl Allen Byers compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

PP. Plaintiff Jordan Edwards compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

QQ. Plaintiff James Earl Frazier compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and

further relief which the Court may determine to be just and equitable under the circumstances.

RR. Plaintiff Michaela Haugabook compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

SS. Plaintiff Timothy Glen Henderson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

TT. Plaintiff Charlie Chris Hill compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

UU. Plaintiff Roosevelt Johnson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

VV. Plaintiff Robert Eugene Jones compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

WW. Plaintiff Ronald Jones compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

XX. Plaintiff Gary Lungrin compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

YY. Plaintiff Charles J. Maxwell compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

ZZ. Plaintiff James Winfield May compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

AAA. Plaintiff Paul Andrew McCathron compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

BBB. Plaintiff Andre McGhee compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

CCC. Plaintiff Delionel B. Meadows compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

DDD. Plaintiff Manuel Anthony Medina compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

EEE. Plaintiff Bryan Mills compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs

and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

FFF. Plaintiff Lynn Arnett Morgan compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

GGG. Plaintiff Wayne P. Neeley compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

HHH. Plaintiff Miguel H. Spruill compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

III. Plaintiff Ronald Tate compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

JJJ. Plaintiff Alvin Levert Wallace compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000;

reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

KKK. Plaintiff Robert Weldon compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

LLL. Plaintiff Lloyd Elliot Wells compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

MMM. Plaintiff Earnest Eugene Wilson compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

NNN. Plaintiff Marshaun A. R. Winston compensatory damages against Defendants, jointly and severally, in an amount in excess of \$10,000,000; reasonable costs and expenses; reasonable attorneys' fees; and such other and further relief which the Court may determine to be just and equitable under the circumstances.

Respectfully submitted,

/s/ Robert L. Bredhoff

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2007, the foregoing Consolidated Fourth Amended Complaint was electronically filed with the United States District Court for the District of Columbia.

/s/ Robert L. Bredhoff
Robert L. Bredhoff