

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SUHAIL NAJIM ABDULLAH
AL SHIMARI, et al.,
Plaintiffs,
v.
CACI PT INTERNATIONAL INC, et ano.,
Defendants.
No. 1:08-CV-827-GBL-JFA

ANSWER AND JURY DEMAND OF DEFENDANT CACI PREMIER
TECHNOLOGY, INC., IN RESPONSE TO PLAINTIFFS' AMENDED COMPLAINT

For its Answer to Plaintiffs' Amended Complaint, Defendant CACI Premier Technology,
Inc. ("CACI PT") states as follows:

PRELIMINARY STATEMENT

CACI PT is of the view that its filing of a Notice of Appeal from the Court's March 18,
2009 Memorandum Order denying in part the CACI Defendants' motion to dismiss has the effect
of divesting this Court of jurisdiction in this action. As a result, CACI PT has no obligation at
this time to file an Answer to Plaintiffs' Amended Complaint. Whether the Court is divested of
jurisdiction is an issue raised in motions pending before the Court. However, it is not expected
that the Court will rule on these issues prior to the deadline that would exist for filing an Answer
if the Court were to conclude that it was not divested of jurisdiction. Therefore, out of an
abundance of caution, CACI PT is filing this Answer to ensure that there is no risk that the Court
might erroneously conclude that it had not been divested of jurisdiction and that CACI PT had
allowed the deadline for responding to the Amended Complaint pass without filing an Answer.

With respect to the numbered paragraphs in Plaintiffs' Amended Complaint, CACI PT states as follows:

1. Paragraph 1 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether CACI PT or CACI International Inc (collectively, the "CACI Defendants") abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 1.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
"JURISDICTION AND VENUE"**

2. CACI PT denies that this Court has subject-matter jurisdiction over Plaintiffs' claims.

3. If this Court has subject-matter jurisdiction, CACI PT admits that venue lies in this Court pursuant to 28 U.S.C. § 1391(a)(3). CACI PT denies the remaining allegations in Paragraph 2.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
"PARTIES"**

4. With respect to the first sentence of Paragraph 4, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies them. Paragraph 4 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks

knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 4.

5. With respect to the first sentence of Paragraph 5, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies them. Paragraph 5 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 5.

6. With respect to the first sentence of Paragraph 6, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies them. Paragraph 6 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 6.

7. With respect to the first sentence of Paragraph 7, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies them. Paragraph 7 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 7.

8. Admitted

9. Admitted

10. CACI PT admits that, over the course of its history, it has provided substantial services to the United States Army, and that one aspect of those services provided was the provision of civilian interrogators in support of the Army's mission in Iraq.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
"THE TORTURE OF SUHAIL NAJIM ABDULLAH AL SHIMARI"**

11. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11, and therefore denies them.

12. Paragraph 12 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs,

or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 12.

13. Paragraph 13 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 13.

14. Paragraph 14 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 14.

15. Paragraph 15 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 15.

16. Paragraph 16 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 16.

17. Paragraph 17 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 17.

18. Paragraph 18 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 18.

19. Paragraph 19 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these

Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 19.

20. Paragraph 20 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 20.

21. Paragraph 21 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 21.

22. Paragraph 22 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations

and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 22.

23. Paragraph 23 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 23.

24. Paragraph 24 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 24.

25. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25, and therefore denies them.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“THE TORTURE OF TAHA YASEEN ARRAQ RASHID”**

26. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26, and therefore denies them.

27. Paragraph 27 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 27.

28. Paragraph 28 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 28.

29. Paragraph 29 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 29.

30. Paragraph 30 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these

Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 30.

31. Paragraph 31 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 31.

32. Paragraph 32 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 32.

33. Paragraph 33 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations

and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 33.

34. Paragraph 34 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 34.

35. Paragraph 35 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 35.

36. Paragraph 36 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs,

or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 36.

37. Paragraph 37 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 37.

38. Paragraph 38 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 38.

39. Paragraph 39 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 39.

40. Paragraph 40 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 40.

41. Paragraph 41 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 41.

42. Paragraph 42 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 42.

43. Paragraph 43 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these

Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 43.

44. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44, and therefore denies them.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“THE TORTURE OF SA’AD HAMZA HANTOOSH AL ZUBA’E”**

45. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45, and therefore denies them.

46. Paragraph 46 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 46.

47. Paragraph 47 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs,

or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 47.

48. Paragraph 48 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 48.

49. Paragraph 49 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 49.

50. Paragraph 50 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 50.

51. Paragraph 51 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 51.

52. Paragraph 52 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 52.

53. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53, and therefore denies them.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“THE TORTURE OF SALAH HASAN NUSAIF JASIM AL-EJAILI”**

54. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54, and therefore denies them.

55. Paragraph 55 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations

and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 55.

56. Paragraph 56 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 56.

57. Paragraph 57 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 57.

58. Paragraph 58 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs,

or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 58.

59. Paragraph 59 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 59.

60. Paragraph 60 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 60.

61. Paragraph 61 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 61.

62. Paragraph 62 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. CACI PT denies the remaining allegations in Paragraph 62.

63. CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63, and therefore denies them.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“THE TORTURE CONSPIRACY”**

64. Paragraph 64 alleges the existence of a conspiracy to torture Plaintiffs, with the members of the alleged conspiracy identified solely as “groups of persons.” CACI PT explicitly denies that it or CACI International Inc (“CACI”) was part of any such conspiracy if it even existed. As to whether others may have engaged in such misconduct, CACI PT lacks knowledge of information sufficient to form a belief of the truth of the allegations and therefore denies them.

65. Denied.

66. Denied.

67. Denied.

68. Denied.

69. Paragraph 69 alleges misconduct by persons involved in a conspiracy to torture Plaintiffs. CACI PT explicitly denies that it or CACI was part of any such conspiracy if it even existed. As to whether others may have engaged in such misconduct, CACI PT lacks knowledge of information sufficient to form a belief of the truth of the allegations and therefore denies them.

70. Denied.

71. Denied.

72. Denied.

73. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“CACI PT COULD HAVE PREVENTED AND STOPPED
THEIR EMPLOYEES FROM TORTURING PLAINTIFFS”**

74. Paragraph 74 states a legal conclusion to which no response is required. To the extent a response is required, CACI PT denies the allegations in Paragraph 74.

75. CACI PT admits that CACI, through a subsidiary, wholly owns CACI PT. CACI PT denies the remaining allegations in Paragraph 75.

76. The allegations of Paragraph 76 of the Amended Complaint are so lacking in context as to be unintelligible. To the extent a response is required, CACI PT denies the allegations in Paragraph 76.

77. CACI PT admits that it does not, and would not, permit its employees to engage in torture. Any such misconduct would be unauthorized and outside the employees’ scope of their employment. CACI PT denies the remaining allegations in Paragraph 77.

78. CACI PT denies that it or CACI was required or expected to provide operational supervision of the employees CACI PT made available to the Army chain of command for use in conducting the Army’s interrogation mission in Iraq, as operational supervision and control was vested at all times in the United States Army leadership.

79. CACI PT admits that it does not, and would not, permit its employees to engage in torture. Any such misconduct would be unauthorized and outside the employees’ scope of their employment. CACI PT denies the remaining allegations in Paragraph 79.

80. Paragraph 80 states a legal conclusion to which no response is required. To the extent a response is required, CACI PT states that the United States Army exercised all operational control over CACI PT employees in Iraq. Responding further, to the extent a response is required, CACI PT denies that it would have vicarious liability for any conduct that is outside the scope of its employees' employment. CACI PT denies the remaining allegations in Paragraph 80.

**RESPONSE TO PARAGRAPH UNDER THE HEADING
“CACI PT AND ITS CO-CONSPIRATORS TOOK STEPS TO COVER UP
THE SCOPE AND EXTENT OF TORTURE”**

79.¹ Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“CACI PT IS ENGAGED IN ONGOING EFFORTS
TO COVER UP THE TORTURE”**

81. Denied.

82. CACI PT, sometimes through counsel, has sent letters to media personnel or entities to identify misleading or false reporting by such persons or entities. CACI PT denies the remaining allegations in Paragraph 82.

83. CACI PT admits that it brought a defamation lawsuit against a talk radio host based on false and misleading statements she made about the CACI Defendants, and that the district court's entry of summary judgment in the defendants' favor was affirmed on appeal. CACI PT denies the remaining allegations in Paragraph 83.

84. Denied.

85. Denied.

¹ The Amended Complaint erroneously has two paragraphs numbered 79.

86. CACI PT admits that its former Chief Executive Officer wrote a book called *Our Good Name*. The remaining allegations in Paragraph 86 seek to characterize the contents of this publicly-available book, and CACI PT states that the contents of the book speak for themselves. To the extent a response is required, CACI PT denies the allegations in Paragraph 86. CACI PT further notes that Paragraph 86 ends with an incomplete sentence. To the extent CACI PT is required to respond to this incomplete sentence, CACI PT does not know what Plaintiffs are seeking to allege and therefore denies whatever allegations may be contained in the sentence fragment at the end of Paragraph 86.

87. Denied.

88. CACI PT is aware of a picture from Abu Ghraib prison depicting Mr. Johnson, who was then a CACI PT employee, but CACI PT denies that the picture depicts torture or a dangerous and harmful stress position. Moreover, CACI PT denies that there is even a prisoner in the photograph. CACI PT denies the remaining allegations in Paragraph 88.

89. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“CACI PT KNEW THAT THEIR TORTURE OF PRISONERS
VIOLATED THE LAWS OF THE UNITED STATES”**

90. CACI PT denies engaging in any conspiracy of any sort with respect to detainees in Iraq. Therefore, CACI PT denies the allegations in Paragraph 90.

91. CACI PT denies engaging in any conspiracy of any sort with respect to detainees in Iraq. Therefore, CACI PT denies the allegations in Paragraph 91.

92. CACI PT denies engaging in any conspiracy of any sort with respect to detainees in Iraq. Therefore, CACI PT denies the allegations in Paragraph 92.

93. CACI PT denies engaging in any conspiracy of any sort with respect to detainees in Iraq. Therefore, CACI PT denies the allegations in Paragraph 93.

94. CACI PT has never supported the treatment of detainees in Iraq in a manner other than that which is required by controlling law. CACI PT denies that the “Army Field Manual” has the force of law. CACI PT denies the remaining allegations in Paragraph 94.

95. CACI PT has never supported the treatment of detainees in Iraq in a manner other than that which is required by controlling law. CACI PT denies the remaining allegations in Paragraph 95.

96. The allegations in Paragraph 96 purport to characterize and quote from a government report, the contents of which speak for themselves. To the extent a response is required, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96 and therefore denies them.

97. CACI PT has never supported the treatment of detainees in Iraq in a manner other than that which is required by controlling law. CACI PT denies the remaining allegations in Paragraph 97.

98. The allegations in Paragraph 98 concern the intentions of the “United States,” by which Plaintiffs presumably mean the United States government. While determining the “intent” of a government comprised of many thousands of personnel is not a foolproof exercise, CACI PT states that it expected its employees to comply with applicable law at all times in supporting the United States’ mission in Iraq, and presumes that United States authorities had the same expectation. CACI PT denies the remaining allegations in Paragraph 98.

99. The allegations in Paragraph 99 concern the position of the “United States,” by which Plaintiffs presumably mean the United States government. CACI PT states that it

expected its employees to comply with applicable law at all times in supporting the United States' mission in Iraq, and presumes that United States authorities had the same expectation. CACI PT denies the remaining allegations in Paragraph 99.

100. CACI PT expected its employees to comply with applicable law at all times in supporting the United States' mission in Iraq. CACI PT denies the remaining allegations in Paragraph 100.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
"CACI PT ACTED NEGLIGENTLY"**

101. Denied.

102. Denied.

103. Denied.

104. Denied.

105. Denied.

106. Denied.

107. Denied.

108. Denied.

109. Denied.

110. Denied.

111. Paragraph 111 merely states the relief sought by Plaintiff, and therefore requires no response. To the extent a response is required, CACI PT admits that Paragraph 111 states what Plaintiffs are seeking, but denies that Plaintiffs are entitled to any recovery from CACI PT.

112. Paragraph 112 merely states the relief sought by Plaintiff, and therefore requires no response. To the extent a response is required, CACI PT admits that Paragraph 112 states what Plaintiffs are seeking, but denies that Plaintiffs are entitled to any recovery from CACI PT.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT ONE
TORTURE”**

113. CACI PT incorporates its responses to Paragraphs 1-112 of the Amended Complaint as if set forth fully herein.

114. Denied.

115. Denied.

116. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT TWO
CIVIL CONSPIRACY TO TORTURE”**

117. CACI PT incorporates its responses to Paragraphs 1-116 of the Amended Complaint as if set forth fully herein.

118. Denied.

119. Denied.

120. Denied.

121. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT THREE
AIDING AND ABETTING TORTURE”**

122. CACI PT incorporates its responses to Paragraphs 1-121 of the Amended Complaint as if set forth fully herein.

123. Denied.

124. Denied.

125. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT FOUR
CRUEL, INHUMAN OR DEGRADING TREATMENT”**

126. CACI PT incorporates its responses to Paragraphs 1-125 of the Amended Complaint as if set forth fully herein.

127. Denied.

128. Denied.

129. Denied.

130. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT FIVE
CIVIL CONSPIRACY TO TREAT PLAINTIFF IN
A CRUEL, INHUMAN OR DEGRADING MANNER”**

131. CACI PT incorporates its responses to Paragraphs 1-130 of the Amended Complaint as if set forth fully herein.

132. Denied.

133. Denied.

134. Denied.

135. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT SIX
AIDING AND ABETTING
CRUEL, INHUMAN AND DEGRADING TREATMENT”**

136. CACI PT incorporates its responses to Paragraphs 1-135 of the Amended Complaint as if set forth fully herein.

137. Denied.

138. Denied.

139. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT SEVEN
WAR CRIMES”**

140. CACI PT incorporates its responses to Paragraphs 1-139 of the Amended Complaint as if set forth fully herein.

141. Denied.

142. Denied.

143. Denied.

144. Denied.

145. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT EIGHT
CIVIL CONSPIRACY TO COMMIT WAR CRIMES”**

146. CACI PT incorporates its responses to Paragraphs 1-145 of the Amended Complaint as if set forth fully herein.

147. Denied.

148. Denied.

149. Denied.

150. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT NINE
AIDING AND ABETTING COMMISSION OF WAR CRIMES”**

151. CACI PT incorporates its responses to Paragraphs 1-150 of the Amended Complaint as if set forth fully herein.

152. Denied.

153. Denied.

154. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT TEN
ASSAULT AND BATTERY”**

155. CACI PT incorporates its responses to Paragraphs 1-154 of the Amended Complaint as if set forth fully herein.

156. Denied.

157. Denied.

158. Denied.

159. Denied.

160. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT ELEVEN
CIVIL CONSPIRACY TO ASSAULT AND BATTER”**

161. CACI PT incorporates its responses to Paragraphs 1-160 of the Amended Complaint as if set forth fully herein.

162. Denied.

163. Denied.

164. Denied.

165. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT TWELVE
AIDING AND ABETTING ASSAULTS AND BATTERIES”**

166. CACI PT incorporates its responses to Paragraphs 1-165 of the Amended Complaint as if set forth fully herein.

167. Denied.

168. Denied.

169. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT THIRTEEN
SEXUAL ASSAULT AND BATTERY”**

170. CACI PT incorporates its responses to Paragraphs 1-169 of the Amended Complaint as if set forth fully herein.

171. Denied.

172. Denied.

173. Denied.

174. Denied.

175. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT FOURTEEN
CIVIL CONSPIRACY TO SEXUALLY ASSAULT AND BATTER”**

176. CACI PT incorporates its responses to Paragraphs 1-175 of the Amended Complaint as if set forth fully herein.

177. Denied.

178. Denied.

179. Denied.

180. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT FIFTEEN
AIDING AND ABETTING SEXUAL ASSAULTS AND BATTERIES”**

181. CACI PT incorporates its responses to Paragraphs 1-180 of the Amended Complaint as if set forth fully herein.

182. Denied.

183. Denied.

184. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT SIXTEEN
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS”**

185. CACI PT incorporates its responses to Paragraphs 1-184 of the Amended Complaint as if set forth fully herein.

186. Denied.

187. Denied.

188. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT SEVENTEEN
CIVIL CONSPIRACY TO INFLICT EMOTIONAL DISTRESS”**

189. CACI PT incorporates its responses to Paragraphs 1-188 of the Amended Complaint as if set forth fully herein.

190. Denied.

191. Denied.

192. Denied.

193. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT EIGHTEEN
AIDING AND ABETTING INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS”**

194. CACI PT incorporates its responses to Paragraphs 1-193 of the Amended Complaint as if set forth fully herein.

195. Denied.

196. Denied.

197. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT NINETEEN
NEGLIGENT HIRING AND SUPERVISION”**

198. CACI PT incorporates its responses to Paragraphs 1-197 of the Amended Complaint as if set forth fully herein.

199. Denied.

200. Denied.

**RESPONSE TO PARAGRAPHS UNDER THE HEADING
“COUNT TWENTY
NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS”**

201. CACI PT incorporates its responses to Paragraphs 1-200 of the Amended Complaint as if set forth fully herein.

202. Denied.

203. Denied.

204. Denied.

**RESPONSE TO PARAGRAPH UNDER THE HEADING
“JURY DEMAND AND PRAYER FOR RELIEF”**

205. Paragraph 205 of the Amended Complaint alleges that the Plaintiffs suffered abuse and/or mistreatment while in United States custody at Abu Ghraib prison. As to whether these Plaintiffs suffered any abuse or mistreatment whatsoever while in United States custody, CACI PT lacks knowledge or information sufficient to form a belief as to the truth of such allegations and therefore denies them. As to whether the CACI Defendants abused or mistreated Plaintiffs, or participated or acquiesced in any mistreatment or abuse of these Plaintiffs by others, CACI PT explicitly denies such allegations. The remainder of Paragraph 205 states Plaintiffs’ jury demand and is a prayer for damages. Because these remaining portions in Paragraph 205 contain no factual allegations, no response is required. To the extent a response is required, CACI PT denies that Plaintiffs are entitled to any relief from CACI PT.

ADDITIONAL DEFENSES

1. CACI PT is immune from suit.
2. Plaintiffs’ claims are preempted.
3. This Court lacks subject-matter jurisdiction over this action.
4. Plaintiffs’ claims raise nonjusticiable political questions.
5. Plaintiffs’ claims are barred by the applicable statutes of limitations.
6. Plaintiffs’ claims are barred by the doctrines of laches, estoppel, and unclean hands.
7. Plaintiffs have failed to exhaust the administrative remedies available to them.
8. The courts of the United States lack the jurisdiction and authority to consider Plaintiffs’ claims, which amount to a request for wartime reparations.

9. CACI PT is not liable on a vicarious liability or respondeat superior theory for any actions of CACI or CACI PT personnel outside the scope of their employment.

10. The actions of CACI PT, and CACI PT's employees in Iraq, were authorized by competent military authority.

11. The Amended Complaint fails to state a claim upon which relief may be awarded.

12. The loaned employee doctrine precludes Plaintiffs' claims.

13. CACI PT may not be subjected to the law of Iraq, which was an invaded and/or occupied territory at the relevant times in question.

14. The United States Constitution prohibits subjecting CACI PT to state tort law for conduct performed in connection with the provision of wartime interrogation services in support of the United States' mission in Iraq.

15. CACI PT owed no duty of care to Plaintiffs.

16. CACI PT cannot be held liable for conduct occurring after CACI PT ceased providing civilian interrogators in support of the United States Army's mission in Iraq.

17. The state secrets doctrine may bar Plaintiffs' claims.

18. Constitutional requirements of due process apply to Plaintiffs' prayer for punitive damages.

RESERVATION OF RIGHTS

This Answer is based on the information known to CACI PT to date, recognizing that CACI PT has not had the opportunity to take discovery from Plaintiffs or third parties in this action. To the extent CACI PT learns of new or additional information, CACI PT reserves its right to amend its Answer and/or to assert additional defenses. All allegations in the Amended Complaint that are not specifically admitted are hereby denied.

JURY DEMAND

CACI PT demands a trial by jury on all issues so triable.

Respectfully submitted,

/s/ J. William Koegel, Jr.

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April 1, 2009

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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