

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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BAILY ZIMMERMAN,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

**COMPLAINT FOR VIOLATION OF THE
FOREIGN SOVEREIGN IMMUNITIES ACT**

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INTRODUCTION

1. This lawsuit seeks damages under the Foreign Sovereign Immunities Act, 28 U.S.C. § 1605A, on behalf of American service members and civilians, and their family members, who were killed or wounded while serving their country in the Islamic Republic of Afghanistan (“Afghanistan”) between approximately 2007 and 2017.

2. While these men and women worked to rebuild post-war Afghanistan, they were attacked by Taliban and al-Qaeda terrorists. Iran sponsored those terrorist attacks in an effort to undermine American foreign policy in Afghanistan. To that end, Iran supported the Afghan Taliban by, among other things, training Taliban terrorists how to attack Americans effectively and paying terrorists who killed U.S. forces. Iran also provided sophisticated weapons that the Taliban used to kill and injure thousands of Americans, including many Plaintiffs.

3. Iran’s support for al-Qaeda was equally potent. That support dates back decades and has included money, weapons, training, logistical assistance, and safe harbor for key al-Qaeda leaders. In 2007, Osama bin Laden himself referred to Iran as al-Qaeda’s “main artery for funds, personnel, and communication.” Iran’s longstanding decision to back al-Qaeda despite sectarian differences between the two reflected Iran’s overriding desire to foment anti-American terrorism around the world. That decision, like the one to provide material support to the Taliban, paid dividends. Iran’s support for al-Qaeda’s activities in Afghanistan substantially contributed to the terrorist violence that killed and injured Americans there.

4. Iran’s support for al-Qaeda complemented its support for the Taliban because of the close relationship between the two terrorist groups. Although al-Qaeda and the Taliban were separate groups that retained their own identities, they also acted together in a “syndicate” that planned and authorized terrorist violence throughout Afghanistan. That syndicate – which involved mafia-style meetings between leaders of the syndicate’s various members – provided a

superstructure that organized and facilitated the Afghan terrorist attacks carried out by its members. By funneling support to multiple members within that syndicate, Iran ensured that its policy of sponsoring anti-American terrorism in Afghanistan achieved maximum effect.

5. Iran has been designated as a State Sponsor of Terrorism since 1984. Iran's agents include Hezbollah, the Islamic Revolutionary Guard Corps ("IRGC"), and the Islamic Revolutionary Guard Corps-Qods Force ("IRGC-QF" or "Qods Force"), among others. Many of Iran's agents are designated as Foreign Terrorist Organizations ("FTOs") under section 219 of the Immigration and Nationality Act (8 U.S.C. § 1189), Specially Designated Global Terrorists ("SDGTs") under 31 C.F.R. § 594.31, or both. As a designated State Sponsor of Terrorism – which routinely employs designated FTOs as instruments of its terrorist agenda – Iran is liable to Plaintiffs for the injuries it caused by deliberately supporting terrorist attacks in Afghanistan.

JURISDICTION AND VENUE

6. This Court has personal and subject-matter jurisdiction over Plaintiffs' claims under 28 U.S.C. §§ 1330(a), 1330(b), 1331, 1332(a)(2), and 1605A, which confer federal jurisdiction over civil actions against State Sponsors of Terrorism like Iran.

7. Venue is proper in this District under 28 U.S.C. § 1391(f)(4).

8. 28 U.S.C. § 1605A(c) provides a federal private right of action against a State Sponsor of Terrorism for personal injury or death caused by an act of torture, extrajudicial killing, aircraft sabotage, hostage taking, or the provision of material support and resources for such acts. The foreign state is liable for the acts of its officials, employees, and agents.

THE DEFENDANT

9. Defendant Islamic Republic of Iran ("Iran") is a foreign state that was designated as a State Sponsor of Terrorism on January 19, 1984, pursuant to section 6 of the Export Administration Act of 1979 (50 U.S.C. § 4605), section 620A of the Foreign Assistance Act of

1961 (22 U.S.C. § 2371), and section 40 of the Arms Export Control Act (22 U.S.C. § 2780). Iran has remained designated continuously since then.

10. Iran is politically and ideologically hostile to the United States and its allies. Particularly through its agents the IRGC and the Qods Force, Iran has consistently provided material support and resources for acts of international terrorism targeting the United States and its overseas interests. Iran's provision of material support for anti-American terrorism commonly includes material support and resources for torture, extrajudicial killings, aircraft sabotage, hostage taking, and other related acts.

11. Iran – including through its officials, employees, and agents acting within the scope of those relationships – provided material support and resources for the commission of acts of torture, extrajudicial killing, aircraft sabotage, and hostage taking by the Taliban and al-Qaeda in Afghanistan, including the extrajudicial killings in which Plaintiffs or their family members were killed or injured. Iran's material support and resources caused Plaintiffs' injuries.

12. Iran provided material support for these acts of terrorism against Americans for the purpose of supporting, enabling, advancing, and benefitting from them.

FACTUAL ALLEGATIONS

I. IRAN HAS LONG SUPPORTED TERRORISM THROUGHOUT THE MIDDLE EAST AND CENTRAL ASIA AS PART OF ITS FOREIGN POLICY

13. The 1979 Iranian Revolution was fueled in large part by militant anti-Americanism. Eliminating the United States' role in the geographic region surrounding Iran – using violence if necessary – was and remains a central tenet of Iranian foreign policy.¹ Since

¹ Col. (ret.) Richard Kemp and Maj. (ret.) Charles Driver-Williams, *Killing Americans and Their Allies: Iran's Continuing War against the United States and the West*, Jerusalem Ctr. For Public Affairs (2015) (“*Killing Americans and Their Allies*”), <http://jcpa.org/killing-americans-allies-irans-war/>.

the Iranian Revolution, Iran has engaged in and supported acts of terrorism directed at the United States and its allies as an instrument of Iran's foreign policy.

14. Iran's support of terrorist proxies like Hezbollah, Hamas, the Taliban, and al-Qaeda is well-documented.² Iran's support for such groups is especially prevalent in geographies where Iran abstains from open conflict. As a result of Iran's consistent and longstanding support of anti-American terrorism, the U.S. State Department formally designated Iran as a State Sponsor of Terrorism in 1984.³ It has maintained that designation at all times since.⁴ In 2007, the U.S. State Department described Iran as "the most active state sponsor of terrorism" in the world and "a threat to regional stability and U.S. interests in the Middle East because of its continued support for violent groups."⁵

15. Iran carries out its support of terrorism largely through the IRGC. The IRGC, a governmental entity of Iran, is a quasi-military state institution that operates separately from the regular Iranian military. The IRGC is organized like a traditional military and includes an army, navy, air force, militia, and special forces.⁶ The IRGC is supervised by the Iranian government, but it also "has a relatively strict command-and-control protocol and answers directly to the Supreme Leader, Ayatollah Ali Khamenei."⁷ The Supreme Leader serves as commander-in-chief of the armed forces, appoints the head of each military service, and declares war and peace.

² See Alireza Nader, Joya Laha, *Iran's Balancing Act in Afghanistan* at 9 (RAND Corp. 2011) ("*Iran's Balancing Act*").

³ See 49 Fed. Reg. 2836-02 (Jan. 23, 1984) (statement of Sec'y of State George P. Shultz designating Iran); U.S. State Dep't, *State Sponsors of Terrorism*, <https://www.state.gov/j/ct/list/c14151.htm>.

⁴ *Id.*

⁵ U.S. State Dep't, *Country Reports on Terrorism 2007* at 172 (Apr. 2008).

⁶ See Fact Sheet: *Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism*, U.S. Treasury Dep't (Oct. 25, 2007).

⁷ *Iran's Balancing Act* at 10.

He also routinely employs the IRGC to further Iran's global terrorist agenda. As the U.S. Treasury Department noted in 2010 when it designated certain IRGC officials pursuant to Executive Order 13224, "Iran also uses the . . . IRGC . . . to implement its foreign policy goals, including, but not limited to, seemingly legitimate activities that provide cover for intelligence operations and support to terrorist and insurgent groups."⁸

16. Members of the IRGC are officials, employees, or agents of Iran. In light of the IRGC's regular support for terrorist organizations and the strict command structure tying them to Iran's central leadership, members of the IRGC act within the scope of employment when providing material support to terrorist organizations.

17. Iran's constitution vests in the IRGC responsibility for defending the Islamic Revolution. The IRGC runs prisons in Iran, and it controls hundreds of companies, particularly in the oil-and-gas, engineering, construction, and defense industries. Some analysts estimate that the IRGC controls up to one-third of Iran's economy – billions of dollars of business.

18. On April 15, 2019, the U.S. State Department designated the IRGC as a FTO.⁹ Announcing the designation, President Trump explained that "the IRGC actively participates in, finances, and promotes terrorism as a tool of statecraft."¹⁰ According to the U.S. State Department's public statement explaining the designation, the IRGC "has been directly involved in terrorist plotting; its support for terrorism is foundational and institutional, and it has killed

⁸ Press Release, U.S. Treasury Dep't, *Fact Sheet: U.S. Treasury Department Targets Iran's Support for Terrorism Treasury Announces New Sanctions Against Iran's Islamic Revolutionary Guard Corps-Qods Force Leadership* (Aug. 3, 2010).

⁹ See 84 Fed. Reg. 15278-01 (Apr. 15, 2019).

¹⁰ Statement from the President on the Designation of the Islamic Revolutionary Guard Corps as a Foreign Terrorist Organization (Apr. 8, 2019).

U.S. citizens.”¹¹ Through the IRGC’s support for terrorist organizations, “[t]he Iranian regime has made a clear choice not only to fund and equip, but also to fuel terrorism, violence, and unrest across the Middle East.”¹²

19. The IRGC has a special foreign division called the Qods Force. The U.S. State Department has observed that “Iran used the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) to implement foreign policy goals, provide cover for intelligence operations, and create instability in the Middle East. The Qods Force is Iran’s primary mechanism for cultivating and supporting terrorists abroad.”¹³ The Qods Force is the driving force behind Iran’s activities in Afghanistan, as well as Iraq and elsewhere in the geographic area.

20. The Qods Force has a long and well-documented history of assassinations, kidnappings, bombings, and arms dealing. It also regularly trains foreign terrorist proxies whose attacks promote Iran’s political goals. The Qods Force, although operationally independent from the rest of the IRGC, is also responsible to and directed by the Supreme Leader of Iran. Major General Qassem Soleimani, who has been the chief of the Qods Force for over twenty years, oversees the Qods Force’ support for terrorist groups to promote Iran’s policies throughout the region. Soleimani takes his directions from the Supreme Leader of Iran, Ayatollah Ali Khamenei, with whom he shares a particularly close relationship.

21. The Qods Force provides weapons, funding, and training for terrorist operations targeting American citizens, including by supporting terrorist organizations such as al-Qaeda, the Taliban, and the Haqqani Network. Iran’s Supreme Leader knows about and sanctions those

¹¹ Fact Sheet: *Designation of the Islamic Revolutionary Guard Corps*, U.S. State Dep’t (Apr. 8, 2019), <https://www.state.gov/designation-of-the-islamic-revolutionary-guard-corps/>.

¹² *Id.*

¹³ U.S. State Dep’t, *Country Reports on Terrorism 2015* at 300 (June 2, 2016).

acts. As the U.S. government's Joint Improvised Explosive Device Defeat Organization ("JIEDDO") concluded: "Iran's use of weapons smuggling networks is fairly predictable and meant to shape the manner in which foreign countries deal with Iran."¹⁴ For that reason, the Qods Force varies the quantity, rate, and types of weapons provided to its proxy terrorist organizations depending on the amount of pressure Iran wants to exert on a particular country. Applying pressure against the United States by funding and supplying terrorist proxies in the Middle East and Central Asia is an official component of Iran's foreign policy.

22. The Qods Force has four regional commands within Iran, with each focused on implementing Iran's foreign policy in a neighboring region. The First Corps focuses on Iraq, the Second Corps on Pakistan, the Third Corps on Turkey and Kurdistan, and the Fourth Corps on Afghanistan.

23. In October 2007, the U.S. Treasury Department designated the Qods Force as a SDGT under Executive Order 13224 for providing material support to the Taliban and other terrorist organizations, including Hezbollah and terrorist groups in Iraq.¹⁵ The U.S. Treasury Department also designated multiple Qods Force members as Specially Designated Nationals pursuant to Executive Order 13224, based on their activities in Afghanistan.¹⁶

24. When the U.S. State Department designated the IRGC as a FTO in April 2019, it designated the Qods Force as one too.¹⁷

¹⁴ Eric Parks, *Iranian Weapons Smuggling Activities in Afghanistan* at 9, JIEDDO J2 Open Source Augmentation and Analysis Cell (Sept. 3, 2009) ("*JIEDDO Report*").

¹⁵ Fact Sheet: *Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism*, U.S. Treasury Dep't (Oct. 25, 2007).

¹⁶ *Id.*

¹⁷ See 84 Fed. Reg. 15278-01 (Apr. 15, 2019).

25. Iran has also utilized its agent, Hezbollah,¹⁸ to commit terrorist attacks.

Hezbollah is a Lebanon-based terrorist group that has pledged fealty to Iran's Supreme Leader. Each year Iran provides Hezbollah approximately \$100 million to \$200 million in funding and weapons. As Ali Akbar Mohtashemi (a Hezbollah founder, former Iranian ambassador to Syria and Lebanon, and former Iranian Minister of Interior) explained, "[Hezbollah] is part of the Iranian rulership; [Hezbollah] is a central component of the Iranian military and security establishment; the ties between Iran and [Hezbollah] are far greater than those between a revolutionary regime with a revolutionary party or organization outside its borders."¹⁹

26. Iran has long provided support – through the IRGC, Qods Force, and Hezbollah – for terrorist attacks against American military forces and contractors. For example, Iran used the IRGC and Hezbollah to train, guide, direct, and motivate Shi'a terrorists targeting American service members and civilians in Iraq.²⁰ Similarly, Iran (acting predominantly through Hezbollah) provided Iraqi terrorists with explosively formed penetrators, a weapon that inflicted more casualties on Americans than any other in Iraq. And Iranian officials have often participated directly in such attacks on Americans in Iraq.

¹⁸ Several decisions in this District have held that Hezbollah is a proxy of Iran. *See Fritz v. Islamic Republic of Iran*, 320 F. Supp. 3d 48, 61 (D.D.C. 2018), *Friends of Mayanot Inst., Inc. v. Islamic Republic of Iran*, 313 F. Supp. 3d 50, 53-55 (D.D.C. 2018); *Peterson v. Islamic Republic of Iran*, 264 F. Supp. 2d 46, 53 (D.D.C. 2003); *Stern v. Islamic Republic of Iran*, 271 F. Supp. 2d 286, 292 (D.D.C. 2003).

¹⁹ *Killing Americans and Their Allies*.

²⁰ *Id.*

II. THE TALIBAN IS PART OF AN AL-QAEDA-BACKED TERRORIST SYNDICATE THAT HAS WAGED A DEADLY INSURGENCY AGAINST AMERICANS IN AFGHANISTAN

27. Since the United States-led overthrow of the Taliban-controlled government in Afghanistan in 2001, terrorists have repeatedly attacked American service members and civilians there. Iran provided material support for those attacks, which killed or injured Plaintiffs.

28. Plaintiffs identify below several terrorist groups, subgroups, and partnerships responsible for the specific attacks that killed and injured them. Each worked in concert and shared resources, personnel, and operational plans. Indeed, the Taliban and al-Qaeda often participated in mafia-style meetings – attended by the leaders of several allied terrorist groups – in which they planned and authorized various terrorist attacks throughout Afghanistan.²¹ Given such coordination, one former CIA official and senior White House advisor called the resulting terrorist superstructure a “syndicate,” composed of al-Qaeda, the Taliban, and several other allied FTOs.²² In fact, bin Laden himself conceived of al-Qaeda as the leader of a broader coalition of terrorists drawing from other terrorist organizations in Pakistan and Afghanistan.²³

29. Iran’s support for multiple components of this “syndicate,” *see infra* Part III, ensured that its support had maximum effect. Due to the mutually reinforcing ties between the Taliban and al-Qaeda in Afghanistan, support for the one benefited the other – and vice versa. Iran recognized those interrelationships and so spread its support across multiple parts of the Afghan terror syndicate. In doing so, Iran was able to achieve its intended effect: wide-ranging

²¹ See Bill Roggio and Thomas Joscelyn, *The al Qaeda – Taliban Connection*, Wash. Exam’r (July 4, 2011) (“*The al Qaeda-Taliban Connection*”), archived at <https://www.washingtonexaminer.com/weekly-standard/the-al-qaeda-taliban-connection>.

²² Bruce Riedel, *Deadly Embrace: Pakistan, America, And The Future Of The Global Jihad* at 1 (Brookings Inst. Press 2d ed. 2011).

²³ *The al Qaeda-Taliban Connection*.

terrorist attacks against Americans, executed mostly by the Taliban but supported by (and sometimes jointly committed with) al-Qaeda and the other components of the syndicate.

30. Against that backdrop, Plaintiffs below identify the principal Afghan terrorist groups, subgroups, and cells that committed the attacks that killed and injured them.

A. The Taliban

31. The Taliban is a Sunni Islamic terrorist organization. It was formed in 1994 and was composed mostly of former mujahedin fighters who had expelled the Soviet Union from Afghanistan. From its inception, the Taliban was a predominantly Pashtun movement led by Mullah Mohammed Omar. It began to overtake Afghanistan in late 1994, seeking to establish a radical Islamic government demanding strict adherence to Sharia law. The Taliban largely ruled Afghanistan from 1996 until 2001, although only three foreign countries formally recognized the Taliban government during that time.

32. From 1996 until after September 11, 2001, the Taliban government harbored Osama bin Laden and al-Qaeda operatives in Afghanistan. Later that year, in response to al-Qaeda's September 11 attacks on the United States and the Taliban's refusal to turn over Osama bin Laden, American-led Coalition forces invaded Afghanistan. They quickly overthrew the Taliban government. By November 2001, the Taliban fled Kabul, and they abandoned Kandahar – their historical stronghold in southern Afghanistan – the following month. While rank-and-file Taliban terrorists dispersed back into the countryside, the Taliban leadership – including Mullah Mohammed Omar – took refuge in Pakistan.

33. In December 2001, the United Nations passed Resolution 1386 authorizing the International Security Assistance Force (“ISAF”) in Afghanistan, whose mandate was to maintain stability in Afghanistan and assist the Afghan government in rebuilding the country.

34. In July 2002, President George W. Bush amended Executive Order 13224 to designate the Taliban and its leader Mullah Mohammed Omar as SDGTs.²⁴

35. In May 2003, after the U.S. military toppled the Taliban-led government, the United States declared an end to major combat operations in Afghanistan. Afghanistan ratified a new Constitution in December 2003, and the Taliban was not invited to participate in the formation of a new government.

36. The Taliban's principal goal has long been to expel Coalition forces from the country and undermine the democratically elected government of Afghanistan. To that end, Taliban began to ramp up its attacks on U.S. forces in Afghanistan during the mid-2000s. The Taliban also started using new attack types, including suicide bombings. For example, the Taliban committed six suicide bombings in Afghanistan in 2004, and 141 in 2006. Remotely detonated bombings more than doubled between 2005 and 2006.

37. In 2008 and 2009, a growing Taliban insurgency attacked U.S. forces throughout Afghanistan with a particular emphasis on the southern provinces of Afghanistan, especially in Helmand and Kandahar provinces. By 2010, the Taliban's power and influence was growing and it had regained much of the territory it had lost after 9/11. Responding to the Taliban's growing threat, U.S. Marines launched counterinsurgency operations focused on "restoring government services, bolstering local police forces, and protecting civilians from Taliban incursion."²⁵ The Taliban, in turn, responded with escalating violence.

²⁴ See Termination of Emergency With Respect to the Taliban and Amendment of Exec. Order No. 13,224, 67 Fed. Reg. 44,751 (Sept. 23, 2001); Exec. Order No. 13,268, 2002 WL 32817626 (July 2, 2002).

²⁵ *Timeline: The U.S War in Afghanistan: 1999 – 2019*, Council on Foreign Rel., <https://www.cfr.org/timeline/us-war-afghanistan>.

38. As of 2018, the Taliban had an active presence in 70% of the country. Although the Taliban was the primary terrorist organization operating in all of the areas of Afghanistan where Plaintiffs (or their family members) were attacked, it was particularly active in the southern provinces in Afghanistan, including the provinces of Helmand, Zabul, and Kandahar. It has concentrated many of its most deadly attacks in and around Kandahar City.

39. The Taliban often attacked American and Coalition forces, U.S. government contractors, and Afghan forces. But it has also targeted civilian aid workers and non-governmental organizations. In recent years, the Taliban has increased attacks on civilians by placing explosives in public locations and using suicide bombers. It has also used civilians to attract Coalition forces before detonating a bomb, frequently killing more civilians than Coalition forces. In doing so, the Taliban routinely violated the laws of war and did not comply with the Geneva Convention.

40. The Taliban – sometimes cooperating with other terrorist groups – committed the terrorist attacks that killed or injured the Plaintiffs in this case. *See infra* Part IV.

41. To effectuate those attacks, the Taliban employed a number of different attack types in service of its terrorist agenda. Most prominently, the Taliban has relied heavily on Improvised Explosive Devices (“IEDs”), including Explosively Formed Penetrators (“EFPs”), designed to destroy American armored vehicles and inflict heavy casualties. Many of the Plaintiffs, or their family members, were killed or injured by a Taliban-planted IED or EFP.

42. The Taliban also has attacked U.S. forces and U.S. government contractors with suicide bombers with increasing frequency in recent years. Many Plaintiffs, or their family members, were killed or injured in Taliban suicide bomber attacks. For example, Army SGT Andrew R. Looney, whose family members are Plaintiffs in this case, was killed on June 21,

2010, when a Taliban suicide bomber detonated his bomb at a checkpoint that SGT Looney was manning. *See infra* ¶¶ 760-73.

43. The Taliban (often through the Haqqani Network, *see infra* Part II.B) has also employed insider attacks carried out by members of the Afghan Army. According to an August 2012 statement by Taliban commander Mullah Mohammed Omar, Taliban terrorists “cleverly infiltrated in the ranks of the enemy according to the plan given to them last year.”²⁶ And he expressly encouraged Afghan officers to defect and join the Taliban. These attacks have taken place in all areas of Afghanistan, and the Taliban regularly claims responsibility for them. Many Plaintiffs in this case, or their family members, were killed or injured in Taliban insider attacks. For example, Army SGT Dillon C. Baldrige and Army SGT William M. Bays, whose family members are Plaintiffs in this case, were killed in an insider attack for which the Taliban claimed responsibility. *See infra* ¶¶ 214-21, 231-37.

B. The Haqqani Network

44. The Haqqani Network is a Sunni Islamic terrorist organization that has been operating in Afghanistan since the 1970s. It was founded by Jalaluddin Haqqani and is now led by his son, Sirajuddin Haqqani. The Haqqani Network is part of the Taliban.

45. On September 19, 2012, the U.S. State Department designated the Haqqani Network as a FTO.²⁷

46. The United States also designated various Haqqani leaders as SDGTs. On February 29, 2008, the U.S. State Department designated Sirajuddin Haqqani for “acts of

²⁶ Bill Roggio, *Mullah Omar Addresses Green-on-Blue Attacks*, Long War J. (Aug. 16, 2012).

²⁷ U.S. State Dep’t, *Country Reports on Terrorism 2017* at 294 (Sept. 2018) (“*Country Reports on Terrorism 2017*”).

terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States.”²⁸ In March 2009, the U.S. State Department put out a bounty of \$5 million for information leading to his capture.²⁹ In 2010 and 2011, the United States designated three other members of the Haqqani Family – Nasiruddin Haqqani, Badruddin Haqqani, and Khalil Al-Rahman Haqqani – as fundraisers and commanders of the Haqqani Network. By February 2014, the U.S. State Department and the U.S. Treasury Department had designated 14 leaders in the Haqqani Network under Executive Order 13224.

47. The Haqqani Network began supplying weapons to the Taliban in the mid-1990s when the Taliban was in its infancy. It has operated as part of the Taliban since approximately 1995, when its founder Jalaluddin Haqqani swore allegiance to the Taliban after the Taliban captured Kabul. Jalaluddin Haqqani was the Minister of Tribal and Border Affairs in the Taliban government until the United States invaded Afghanistan.

48. The Haqqani Network is especially active in the southeastern parts of Afghanistan, particularly the provinces of Paktia, Paktika, and Khost, collectively called Loya Paktia. It also developed a significant presence in the surrounding provinces of Kabul, Logar, Wardak, Ghazni, and Zabul. Because of the Haqqani Network’s longstanding tribal connections to the southeastern region of Afghanistan, the Taliban often acts through the Haqqani Network in these areas. The Haqqani Network leads the Taliban’s Miramshah Shura – one of the four councils below the Taliban’s leadership council – for Loya Paktia and provinces north towards

²⁸ Notice, U.S. State Dep’t, *In the Matter of the Designation of Sirajuddin Haqqani, aka Sirajuddin Haqqani, aka Siraj Haqqani, aka Siraj Haqani, aka Sarj Haqqani, aka Saraj Haqani, as a Specially Designated Global Terrorist Pursuant to Section 1(b) of Executive Order 13224, as Amended* at 12499 (Mar. 7, 2008).

²⁹ Press Release, U.S. State Dep’t, *Rewards For Justice: Sirajuddin Haqqani* (Mar. 25, 2009).

Kabul. Sirajuddin Haqqani explained in a 2010 interview that the Haqqani Network is “assigned by the Islamic Emirate in the southeastern front of Afghanistan (Paktia, Khost, Paktika) and we have mujahideen members [guerilla fighters] who are carrying out jihad in the north (provinces in northern Afghanistan) and in the south (provinces in southern Afghanistan), and they are operating under the Amirs of the provinces they are under.”³⁰ The Taliban relies on the Haqqani Network to carry out the Taliban’s operations within the Haqqani Network’s sphere of influence, permitting the Taliban to present a united terrorist front throughout much of the country.

49. The Taliban’s terrorist commanders and shadow governors in the Loya Paktia area are often members of the Haqqani Network. As the U.S. State Department explained when it announced the designation of Mullah Sangeen Zadran as a SDGT, Sangeen Zadran served as the “Shadow Governor for Paktika province, Afghanistan and a commander of the Haqqani Network, a Taliban-affiliated group.”³¹ Similarly, Abdul Aziz Abbasin is a “key commander in the Haqqani Network” and the Taliban’s shadow governor for the Orgun District of Paktika Province.³²

50. The Haqqani Network’s influence is not limited to the southeastern provinces. There is significant overlap between the broader leadership of the Taliban and the Haqqani Network. Sirajuddin Haqqani (Jalaluddin’s son and successor) has been a member of the Taliban’s governing council since at least 2010. Since 2015 he has been the Deputy Emir of the Taliban, the second in command in the Taliban’s leadership.

³⁰ Bill Roggio, *Taliban Cooperation With al Qaeda ‘Is At The Highest Limits’ – Siraj Haqqani*, Long War J. (Apr. 15, 2010).

³¹ Media Note, *Designation of Haqqani Network Commander Sangeen Zadran*, Office of the Spokesperson, U.S. State Dep’t (Aug. 16, 2011).

³² Bill Roggio, *US adds 5 al Qaeda, Taliban, Haqqani Network, and IMU facilitators to terrorist list* (Sept. 29, 2011).

51. In particular, the Haqqani Network has overseen the Taliban’s terrorist attacks on U.S. and Coalition forces in Afghanistan. Jalaluddin Haqqani planned many of the Taliban’s attacks on U.S. forces in the early days following the overthrow of the Taliban government. In October 2001, a purported Jihadist publication (as published online) described Jalaluddin as the “chief of the Taliban army.”³³ Indeed, in an interview with Sirajuddin published by Gulf News UAE, the interviewer identified Jalaluddin as “the commander-in-chief of the Taliban’s southern military command” – akin to the Taliban army chief – “[and] Mullah Omar’s top military strategist and commander.”³⁴ As for his son, Sirajuddin is now Deputy Emir of the Taliban and oversees its terrorist operations throughout the country.

52. According to Brigadier General Charles H. Cleveland, the chief spokesman for United States and NATO forces in Afghanistan, as of 2016 Sirajuddin Haqqani “increasingly runs the day-to-day military operations for the Taliban, and, we believe, is likely involved in appointing shadow governors.”³⁵

53. In 2016, the *New York Times* reported that, according a senior Taliban commander in southern Afghanistan, Sirajuddin Haqqani was in “constant contact” with Taliban field commanders throughout Afghanistan, including outside the Haqqani Network’s area of particular influence in the southeast.³⁶ According to the commander, all field commanders must contact Sirajuddin Haqqani for permission before launching a surge or changing fighting plans.

³³ Karachi Jasarat, *Chief of Taliban Army Contacts Jamaat-i-Islami Chief* (Oct. 11, 2001).

³⁴ Aslam Khan, *Taliban Leader Warns Of Long Guerilla War*, Gulf News UAE (Oct. 21, 2001), <https://gulfnews.com/uae/taliban-leader-warns-of-long-guerrilla-war-1.427860>.

³⁵ Mujib Mashal, *Haqqanis Steering Deadlier Taliban in Afghanistan, Officials Say*, N.Y. Times (May 7, 2016).

³⁶ *Id.*

54. The Haqqani Network also influenced Taliban strategic decisions about which types of attacks to employ. The Haqqani Network was the first to use suicide bombings in Afghanistan, an innovation that al-Qaeda taught it. The Haqqani Network also was involved in the rising number of Taliban insider attacks – attacks that strategically undermine relations between U.S. and Afghan forces. By 2007, Army Lieutenant Colonel Dave Anders, the director of operations for Combined Joint Task Force-82, explained that “Siraj[uddin Haqqani] is the one dictating the new parameters of brutality associated with Taliban senior leadership” employing “[k]idnappings, assassinations, beheading women, indiscriminate killings and suicide bombers.”³⁷

55. The Haqqani Network’s influence within the broader Taliban is not limited to planning and authorizing attacks. Even outside of the Haqqani Network’s traditional stronghold, its members often commit attacks along with other Taliban terrorists. For example, in early 2009 the Haqqani Network was operating in the Southern provinces of Helmand and Kandahar. A spokesman for the Taliban confirmed that the Haqqani Network was operating in “Kandahar as well as nearby Helmand province to provide training, support – particularly in bomb-making – and to carry out attacks.”

56. In 2013, “[a] combined force in ... Kandahar [] arrested a Haqqani network facilitator who managed supply routes from [Kandahar City] to other provinces” and was “also [] believed to have been instrumental in the acquisition and distribution of lethal aid to Haqqani fighters for attacks against Afghan and coalition forces.”³⁸ And a successful 2017 Taliban attack

³⁷ Bill Roggio, *Targeting Taliban Commander Siraj Haqqani*, Long War J. (Oct. 20, 2007).

³⁸ News, U.S. Dep’t of Def., *Afghan, Coalition Forces Kill Insurgents in Logar Province* (Feb. 20, 2013), <https://archive.defense.gov/news/newsarticle.aspx?id=119329>.

in Kandahar against the U.A.E. ambassador to Afghanistan, Juma Mohammad Abdullah al-Kaabi, has been attributed to the Haqqani Network.

57. Both Sirajuddin and Jalaluddin Haqqani have confirmed that the Haqqani Network operates as part of the Taliban.³⁹ The Taliban, for its part, has likewise rejected claims that the Haqqani Network is a separate entity from the Taliban.⁴⁰

58. The Haqqani Network also has significant links to al-Qaeda, dating back to the 1980s when Osama bin Laden established a training camp for his nascent terrorist group in Haqqani-controlled territory. After the September 11, 2001 attacks, the Haqqanis provided sanctuary to bin Laden after he fled Afghanistan; Jalaluddin Haqqani himself announced that the Taliban would “retreat to the mountains and begin a long guerilla war to reclaim our pure land from infidels” and to “state clearly that Osama bin Laden is not only safe and sound, he is also in good spirits.”⁴¹

59. The Haqqani Network’s close relationships with other terrorist groups have helped spawn the modern terrorist syndicate operating in Afghanistan. Senior Haqqani Network officials have indicated that the Haqqani Network and al-Qaeda operate as one group.⁴² And in July 2008, Jalaluddin Haqqani’s son – 18 year old Muhammad Omar Haqqani -- was killed alongside a top al-Qaeda commander in southeast Afghanistan. The Haqqani Network also maintains training camps and safe houses that are used by both al-Qaeda and Taliban operatives.

³⁹ Bill Roggio, *US Military Searches for Kabul Attack Network Members*, Long War J. (Apr. 27, 2016).

⁴⁰ Bill Roggio, *Taliban Call Haqqani Network a ‘Conjured Entity’*, Long War J. (Sept. 9, 2012).

⁴¹ Aslam Khan, *Taliban Leader Warns Of Long Guerilla War*, Gulf News UAE (Oct. 21, 2001).

⁴² See Bill Roggio, *An Interview With Mullah Sangeen*, Long War J. (Sept. 17, 2009).

60. More recently, Sirajuddin Haqqani has welcomed al-Qaeda members to join and fight with the Haqqani Network and the rest of the Taliban. According to U.S. intelligence officers, Sirajuddin Haqqani acts as a member of al-Qaeda's military council. U.S. officials have described him as al-Qaeda's top facilitator in Afghanistan.⁴³

61. The U.S. Treasury Department has repeatedly recognized the links between Haqqani Network leaders and al-Qaeda. For example, in July 2010, the U.S. Treasury Department designated Nasiruddin Haqqani, the brother of Sirajuddin, pursuant to Executive Order 13224.⁴⁴ The designation noted that Nasiruddin had received funding via payments from Al-Qaeda.⁴⁵ And when the U.S. Treasury Department designated Sirajuddin Haqqani's uncle Khalil Al-Rahman Haqqani as a SDGT in 2011, it noted that he "has also acted on behalf of al-Qa'ida and has been linked to al-Qa'ida military operations."⁴⁶

62. The Haqqani Network is often considered the most radical part of the Taliban. Like the Taliban, it relies on terrorist attacks – including suicide bombings, IED attacks, insider attacks, and complex attacks – rather than open combat.⁴⁷ The Haqqani Network routinely violates the laws of war and does not comply with the Geneva Conventions.

⁴³ Hindustan Times, *Al Qaeda Very Active In Afghanistan, Preparing For Attacks* (Apr. 13, 2016) ("The Taliban's current deputy commander, Siraj Haqqani, is head of the Haqqani Network and al Qaeda's top facilitator in Afghanistan, according to US officials.").

⁴⁴ See, e.g., Press Release, U.S. Treasury Dep't, *Treasury Targets Taliban and Haqqani Network Leadership: Treasury Designates Three Financiers Operating in Afghanistan and Pakistan* (Jun. 22, 2010).

⁴⁵ *Id.*

⁴⁶ Press Release, U.S. Treasury Dep't, *Treasury Targets the Financial and Support Networks of Al Qa'ida and the Taliban, Haqqani Network Leadership* (Feb. 9, 2011).

⁴⁷ Bill Roggio, *Haqqani Network Promotes Suicide, IED Attacks, and Ambushes in 'Caravan of Heroes'*, Long War J. (Apr. 10, 2015).

63. Many Plaintiffs, or their family members, were killed or injured in attacks by the Haqqani Network. For example, the Haqqani Network conducted terrorist attacks in the Loya Paktia area of Afghanistan, including the May 6, 2012 IED attack that severely injured Army CPL Jonathan Cleary. *See infra* ¶¶ 394-95.

64. The Haqqani Network also participated in the attack on Forward Operating Base Chapman that killed seven Americans on December 30, 2009, including Harold Brown, Jr., whose family members are Plaintiffs in this case. *See infra* ¶¶ 322-29.

C. Al-Qaeda

65. Osama bin Laden formed al-Qaeda in the late 1980s in Afghanistan in response to the Soviet occupation of Afghanistan. For decades, al-Qaeda has been a Sunni Islamic terrorist organization with the intent of destroying the United States.

66. Following the Soviet withdrawal from Afghanistan, Osama bin Laden began to transform al-Qaeda into a global terrorist group capable of launching attacks around the world. After moving to Sudan in the early 1990s, al-Qaeda's leadership returned to Afghanistan in approximately 1996, where it was sheltered by the Taliban for the next five years. Osama bin Laden declared war on the United States in a published fatwa (religious decree) in 1996.⁴⁸ One scholar who surveyed first-hand accounts of the initial meeting between bin Laden and the Taliban during this time reported that it “emphasize[d] the Taliban’s humble attitude toward the Saudi guest and their immediate readiness to serve him.”⁴⁹

⁴⁸ Anne Stenersen, *Al-Qaida in Afghanistan* at 62-63 (Cambridge Univ. Press, 2017) (“Stenersen, *Al-Qaida in Afghanistan*”); *Osama bin Laden*, Counter Extremism Project, <https://www.counterextremism.com/extremists/osama-bin-laden>; *The 9/11 Commission Report* at 48, National Commission on Terrorist Attacks Upon the United States, <https://govinfo.library.unt.edu/911/report/911Report.pdf>.

⁴⁹ Stenersen, *Al-Qaida in Afghanistan* at 58.

67. In return for the Taliban's safe harbor, al-Qaeda provided substantial resources to the Taliban. By March 1997, bin Laden had met with Mullah Mohammed Omar personally and offered to lend his fighters to the Taliban in their battles with northern factions that were still resisting Taliban rule. As bin Laden's deputy, Abu Hafs al-Masri, wrote at the time, "The [Taliban] movement is a capable Islamic entity and it is possible that it can be a turning point for the betterment of the Islamic world. The movement needs a vision and it needs support. It needs someone who will give it a military strategy. And it needs to build a military force which is suitable for the situation in Afghanistan."⁵⁰ Al-Qaeda supplied the strategy and support that the Taliban needed to morph into a deadly terrorist group capable of inflicting mass casualties on Americans. During this time period, al-Qaeda also shared technical knowledge with the Taliban and reportedly paid the Taliban \$10 to \$20 million a year for shelter.

68. At the same time that bin Laden was cementing his ties with the Taliban, he was escalating his attacks on the United States. In 1998, while under the Taliban's protection, he declared a global jihad calling on all Muslims to kill Americans at any opportunity.

69. On August 7, 1998, al-Qaeda suicide bombers in explosive-laden trucks attacked the U.S. embassies in Kenya and Tanzania, killing more than 200 people and wounding more than 5,000 others. The United States responded two weeks later with missile strikes on al-Qaeda bases in Afghanistan and demanded that Mullah Omar turn over bin Laden. He refused.

70. As a result of these and other terrorist attacks, the U.S. State Department designated al-Qaeda as a FTO on October 8, 1999. A week later the U.N. called for sanctions against the Taliban unless it expelled bin Laden from Afghanistan. Again, the Taliban refused.

⁵⁰ Stenersen, *Al-Qaida in Afghanistan* at 67-68.

71. In the spring of 2001, bin Laden, on behalf of al-Qaeda, pledged an oath of allegiance to Mohammed Omar and the Taliban. A few months later, on September 11, 2001, al-Qaeda attacked the World Trade Center in New York and the Pentagon, killing thousands. A third attack, possibly aimed at the White House, was thwarted by passengers aboard United Flight 93. The United States demanded once again that the Taliban turn over bin Laden, and once again the Taliban refused. A U.S.-led coalition invaded Afghanistan in October, and bin Laden and Taliban leaders eventually fled to Pakistan.

72. Al-Qaeda's and the Taliban's close relationship continued long after 9/11. Since the end of the Taliban's rule in Afghanistan, al-Qaeda terrorists have often worked in close conjunction with Taliban terrorists and the affiliated Haqqani Network and Kabul Attack Network. In May 2007, Taliban official Mullah Dadullah said, "[W]e and al-Qaeda are as one."⁵¹ In early 2009, a military-intelligence official was quoted as saying, "The line between the Taliban and al Qaeda is increasingly blurred, especially from a command and control perspective."⁵² By the end of that year, Chairman of the Joint Chiefs of Staff Admiral Michael Mullen said the same thing openly. "We are deeply concerned about the growing level of collusion between the Taliban and al Qaeda" he told *The Wall Street Journal*.⁵³ And as Lieutenant General Ronald L. Burgess, Jr. reported in a February 2010 Hearing of the Senate Select Committee on Intelligence, "al Qaeda's propaganda, attack planning and support of the Taliban and Haqqani networks continues."⁵⁴

⁵¹ Thomas Ruttig, *The Other Side* 23, Afghanistan Analysts Network (July 2009).

⁵² Bill Roggio, *Al Qaeda Builds A 'Shadow Army'*, Wash. Times (Feb. 13, 2009).

⁵³ Anand Gopal, *Afghan Police Killings Highlight Holes in Security*, Wall St. J. (Dec. 15, 2009).

⁵⁴ Transcript, Hearing Of The Senate Select Committee On Intelligence Subject: "Current And Projected Threats To The United States, Fed. News Serv. (Feb. 2, 2010), 2010 WLNR 27828348.

73. The Taliban and al-Qaeda have remained intimately intertwined. For example, in 2015, Osama bin Laden's successor, Ayman Zawahiri, pledged an oath of allegiance to the recently-installed Taliban leader Mullah Akhtar Mohammad Mansour, who publicly announced his acceptance of the pledge the following day.⁵⁵ When Mansour was killed in May 2016, Zawahiri pledged allegiance to his successor, Mawlawi Haibatullah Akhundzada.

74. Often, individual Taliban leaders are also members of al-Qaeda. For example, in late 2011 or early 2012 the Taliban appointed Sheikh Mohammed Aminullah, who has close ties to al-Qaeda, as the head of its Peshawar Regional Military Shura, which is responsible for attacks in northern and eastern Afghanistan.

75. Al-Qaeda also encouraged the Taliban to embrace new terrorist techniques. In February 2003, bin Laden issued a recording calling specifically for suicide attacks in Afghanistan and Iraq. The Taliban had previously viewed suicide attacks as taboo, but al-Qaeda convinced them they were religiously permissible. Indeed, al-Qaeda trumpeted their ideological success online, announcing, "While suicide attacks were not accepted in the Afghani culture in the past, they have now become a regular phenomenon!"⁵⁶ With al-Qaeda's encouragement – and training – the number of such suicide attacks in Afghanistan increased from one in 2002, two in 2003, and six in 2004 to 21 in 2005 and more than 100 in 2006. Al-Qaeda also paid the families of suicide bombers in Afghanistan.

76. Al-Qaeda's role in that suicide-bombing trend was pivotal. As Islamic history scholar Bryan Glyn Williams explained, "Al Qaeda operatives carried out two to three [suicide]

⁵⁵ Thomas Joscelyn & Bill Roggio, *New Taliban Emir Accepts al Qaeda's Oath Of Allegiance*, Long War J. (Aug. 14, 2015).

⁵⁶ Brian Glyn Williams, *Suicide Bombings In Afghanistan*, Jane's Islamic Affairs Analyst at 5 (Sept. 2007).

bombings per year on the Afghan government and NATO troops from 2002 to 2004 that were meant to demonstrate the effectiveness of this alien tactic to the local Taliban. These demonstrative acts and videos of successful [Al Qaeda] suicide bombings in Iraq seem to have convinced the Taliban to condone the previously taboo tactic of suicide bombing.”⁵⁷

77. Al-Qaeda operatives also served as embedded trainers with Taliban forces. These experienced trainers provided instructions, funding, and resources for conducting local and international attacks. By 2005 at the latest, al-Qaeda began bringing instructors from Iraq to train the Taliban how to fight Americans. For example, al-Qaeda members trained Taliban commanders in bomb-making techniques. Al-Qaeda also invited Taliban commanders to Iraq, where they learned how to make armor-penetrating “shaped” charges,⁵⁸ a type of IED later known as an EFP. Taliban trainees also learned how to use remote controls and timers, and urban warfare tactics.

78. As one writer put it in November 2009, “Small numbers of Al Qaeda instructors embedded with much larger Taliban units have functioned something like U.S. Special Forces do – as trainers and force multipliers.”⁵⁹

79. By the mid-2000’s, al-Qaeda’s partnership with the Haqqani Network had facilitated the emergence of a network al-Qaeda training camps in North Waziristan. According to a declassified 2008 Defense Intelligence Agency intelligence report:

[Sirajuddin] Haqqani is also affiliated with the several foreign fighter (ff) training facilities that are controlled by or associated with al Qaeda (AQ) in North Waziristan. ... A list and brief description of each facility follows.

⁵⁷ Bryan Glyn Williams, *Afghanistan Declassified: A Guide to America’s Longest War* at 202 (Univ. Penn. Press 2012).

⁵⁸ Sami Yousafzai, *Unholy Allies*, Newsweek (Sept. 25, 2005).

⁵⁹ Peter Bergen, *The Front*, New Republic (Oct. 19, 2009), <https://newrepublic.com/article/70376/the-front>.

- A. Mohammad Taher ((Yuldashov)), leader of the Islamic Movement of Uzbekistan (IMU), and his 60 bodyguards are staying at an AQ training center in Miram Shah Dand.
- B. There is an al-Qaeda training center located at the Miskeen and Khaisur in Miram Shah. Approximately 45 U/I Arabs and Uzbeks receive training there.
- C. An AQ training facility called “Shaki Massod” is located in Miram Shah and over 200 AQ members (NFI) reside there; Usama bin Laden has been seen in this center (NFI).
- D. Another AQ training facility is located at Spin-Qamar in Masood District of Northern Waziristan. Over 80 Arabs receive training there (NFI).⁶⁰

80. Al-Qaeda has also established multiple training camps within Afghanistan reportedly “hosted by the Taliban.”⁶¹ One such camp covered nearly 30 square miles and contained heavy weapons, IED-making material, anti-aircraft weapons, rocket-propelled grenade systems, machine guns, pistols, rifles, and ammunition.

81. On top of the myriad forms of support detailed above, al-Qaeda also jointly planned and authorized terrorist attacks that the Taliban carried out. Those joint planning sessions often occurred in meetings in which al-Qaeda, the Taliban, and other members of the al-Qaeda-Taliban syndicate (such as Lashkar-e-Taiba) would confer about particular geographies and targets to attack.⁶² The close operational coordination not only manifested itself in the Kabul Attack Network, but also provided a broader terrorist superstructure that organized the insurgency throughout Afghanistan. In observing that this superstructure formed an Afghan-Pakistani “syndicate” of sorts, a former CIA analyst and White House advisor documented several notable syndicate-sponsored terrorist attacks in Afghanistan that “demonstrated the

⁶⁰ Defense Intelligence Agency, *Location and Activities of the Training Centers Affiliated with the Haqqani Network, Taliban, and al-Qaeda in Northern Waziristan and Future Plans and Activities of Sarajuddin ((Haqqani))*, Intelligence Information Report (Apr. 16, 2008) (emphasis in original), <https://www.dia.mil/FOIA/FOIA-Electronic-Reading-Room/FOIA-Reading-Room-Other-Available-Records/FileId/155424/>.

⁶¹ Thomas Joscelyn and Bill Roggio, *Trump’s Bad Deal With The Taliban*, Politico (Mar. 18, 2019).

⁶² *The al Qaeda-Taliban Connection*.

intricate connections between al Qaeda and its allies in Pakistan and Afghanistan.”⁶³ Those intimate connections enhanced the lethality of the overall anti-American insurgency.

82. Information derived from al-Qaeda and Taliban detainees held at Guantanamo Bay, Cuba (“Gitmo”) corroborates the planning and authorization activities of the al-Qaeda-Taliban syndicate. For example, according to purported Gitmo intelligence files quoted by terrorism experts Bill Roggio and Thomas Joscelyn, one detainee, Abdul Razak, was a “high-level military commander in a newly-conceived ‘unification’ of Al Qaeda, [Hezb-e-Islami Gulbuddin (“HIG”)] and Taliban forces within Afghanistan,” which the leaders of the respective terrorist groups “envisioned [as a] new coalition of HIG, Al Qaeda, and Taliban during a meeting in Pakistan in early spring 2003.”⁶⁴ Another purported Gitmo detainee file quoted by Messrs. Roggio and Joscelyn concerning Haroon al Afghani, a dual-hatted al-Qaeda/HIG terrorist, contained the following intelligence report:

[Afghani] is assessed to have attended a joint operations meeting among extremist elements in mid-2006. A letter describing an 11 August 2006 meeting between commanders of the Taliban, al Qaeda, [Lashkar e Taiba], . . . and the Islamic Party (probably a reference to the HIG), disclosed that the groups decided to increase terrorist operations in the Kapisa, Kunar, Laghman, and Nangarhar provinces, including suicide bombings, mines, and assassinations.⁶⁵

83. Taken together, these reports “demonstrate a high degree of collusion between al Qaeda and other terrorist groups” as part of a “jihadist hydra” that shares the “common goal” of seeking to “drive the U.S.-led coalition out of Afghanistan.”⁶⁶ One al-Qaeda operative, whom U.S. officials characterized as “an important al-Qaida planner and explosives expert,” Ghazwan

⁶³ Bruce Riedel, *Deadly Embrace: Pakistan, America, And The Future Of The Global Jihad* at 100 (Brookings Inst. Press 2d ed. 2011).

⁶⁴ *The al Qaeda – Taliban Connection*.

⁶⁵ *Id.*

⁶⁶ *Id.*

al-Yemeni, trained Taliban members in Pakistan.⁶⁷ He eventually helped plan the December 30, 2009 attack on Camp Chapman that seven American CIA Agents, including Harold Brown, Jr., whose family members are Plaintiffs in this case.⁶⁸ *See infra* ¶¶ 322-29.

84. Al-Qaeda terrorists also regularly attacked U.S. forces alongside Taliban terrorists, including in some of the attacks that killed or injured Plaintiffs. For example, in the early 2000s, al-Qaeda's third-ranking member participated in attacks on Americans in Afghanistan alongside Taliban terrorists under the command of Sirajuddin Haqqani. As another example, on July 13, 2008, Taliban and al-Qaeda members jointly attacked a U.S.-Afghan outpost in Nuristan Province. Nine ISAF soldiers – including Army 1LT Jonathan P. Brostrom, Army CPL Jason M Bogar, Army SPC Jason D. Hovater, Army CPL Pruitt A. Rainey, and Army SGT Michael E. Ristau, whose family members are Plaintiffs in this case – were killed in the attack. *See infra* ¶¶ 292-97, 316-21, 689-92, 94245, 1147-50.

D. The Kabul Attack Network

85. The Kabul Attack Network is the operational manifestation of the terrorist syndicate led by al-Qaeda and the Taliban, including the Haqqani Network. Specifically, the Kabul Attack Network is a set of terrorist cells focused on attacks against targets in Kabul and extending outward into the provinces of Logar, Wardak, Nangarhar, Kapisa, Ghazni, and Zabul.⁶⁹ It is active around key waypoints and transit routes on the way to Kabul, including

⁶⁷ Evan F. Kohlmann, *Al-Qa'ida's Yemeni Expatriate Faction in Pakistan*, CTC Sentinel at 11-12 (Jan. 2011).

⁶⁸ *Id.*

⁶⁹ Bill Roggio, *Karzai Assassination Plotters Part of Kabul Attack Network*, Long War J. (Oct. 5, 2011).

Wardak, Ghazni City, and areas of Logar Province. The Kabul Attack Network was responsible for suicide bombings and other attacks on Americans in Kabul and the surrounding areas.⁷⁰

86. The Kabul Attack Network's members include the Taliban, including the Haqqani Network, as well as al-Qaeda, Lashkar-e-Tayyiba, and other terrorists active in the Kabul area.

87. The Kabul Attack Network is led by Mullah Dawood, the Taliban's shadow governor for Kabul who is also a Taliban and Haqqani Network commander, and Taj Mir Jawad, a top commander in the Haqqani Network with a long history of high-profile attacks.

88. According to an ISAF public affairs officer, the "Haqqani Network is deeply entrenched in the Kabul Attack Network, specifically in the facilitation of weapons and fighters into the area south of Kabul in Logar and Wardak."⁷¹ Senior Haqqani Network leaders often planned and executed terrorist attacks by the Kabul Attack Network, sometimes even giving tactical advice during attacks.

89. Many Plaintiffs, or their family members, were killed or injured in attacks by the Kabul Attack Network. For example, on October 29, 2011, the Kabul Attack Network executed a suicide bombing attack that destroyed a large armored bus transporting forces around Kabul and killed Army LTC David E. Cabrera and SSG Christopher R. Newman, whose family members are Plaintiffs, and 16 others. *See infra* ¶¶ 154-64, 871-75. Almost four years later, on August 22, 2015, the Kabul Attack Network murdered U.S. government contractors (and Army veterans) Richard P. McEvoy and Corey J. Dodge, whose family members are also Plaintiffs, in a suicide bombing attack against a NATO convoy in Kabul. *See infra* ¶¶ 513-18, 816-22.

⁷⁰ See Bill Roggio, *Afghan Intel Captures Taliban Commander Involved In Targeting 'Foreigners' In Kabul*, Long War J. (Mar. 31, 2015).

⁷¹ Bill Roggio, *Senior Taliban Commander Killed in Eastern Afghanistan*, Long War J. (Aug. 20, 2010).

III. IRAN PROVIDED MATERIAL SUPPORT TO THE TALIBAN AND AFFILIATED TERRORIST GROUPS IN AFGHANISTAN

A. Iran Provided Material Support For Anti-American Terrorism in Afghanistan To Undermine The U.S. Mission There

90. Although there are religious differences between the Shiite Iranian regime and the Sunni Taliban organization, such differences have not prevented Iran from supporting the Taliban's terrorist activities. Iran and the Taliban share a core geopolitical aim: to inflict mass casualties on Americans in the region. As two military-intelligence scholars observed, "the Iranian regime is ideologically and religiously opposed to the Taliban, [but] it nevertheless views the group as a useful counterweight to the United States."⁷² Similarly, as a Taliban commander stated in 2010 of Iran, "Our religions and our histories are different, but our target is the same – we both want to kill Americans."⁷³ Sectarian distinctions aside, Iran has supported and funded attacks by the Taliban on U.S. and allied forces in Afghanistan to harm the United States.

91. The Fourth Corps of the Qods Force, one of its four regional commands, implements Iran's foreign policy in Afghanistan.⁷⁴ During the relevant timeframe, the Qods Force did so largely by providing the Taliban (including the Haqqani Network) with material support for terrorist attacks in Afghanistan. The Fourth Corps' al-Ansar Command Center is based in Iran's second-largest city, Mashhad, near the border with Afghanistan.⁷⁵ Mashhad naturally serves as a stopping point between Afghanistan and Tehran, Iran's capital.⁷⁶

⁷² *Iran's Balancing Act* at 5.

⁷³ Bill Roggio, *Taliban Commander Linked To Al Qaeda, Iran, Killed In US Strike In Western Afghanistan*, Long War J. (July 16, 2010).

⁷⁴ *JIEDDO Report* at 5.

⁷⁵ Joseph Felter & Brian Fishman, *Iranian Strategy in Iraq, Politics and "Other Means"* 18, Combating Terrorism Center (Oct. 13, 2008).

⁷⁶ *JIEDDO Report* at 5.

92. As early as January 2000, Iranian officials met with the Taliban to offer material support and resources in defeating the U.S.-led Coalition forces who had recently invaded Afghanistan. Following the 9/11 attacks on the United States, Iran met again with senior Taliban officials. Iran planned that meeting and hosted it on the Iranian side of the Afghanistan border. As part of this initial offer of support, Iran pledged to sell advanced military equipment to the Taliban for use against U.S. and allied forces, boasted of Iran's ability to track U.S. troop movements, and promised to allow terrorists entering Afghanistan to travel through Iranian territory. Iran also provided safe harbor to Taliban leaders who escaped U.S. forces.

93. Immediately following the U.S. invasion of Afghanistan, Iran made a pretense of professing support for the U.S. and NATO mission, but in reality was already seeking to undermine it. In February 2002, then-CIA Director George J. Tenet testified before Congress that "initial signs of Tehran's cooperation and common cause with us in Afghanistan are being eclipsed by Iranian efforts to undermine US influence there. While Iran's officials express a shared interest in a stable government in Afghanistan, its security forces appear bent on countering the US presence."⁷⁷ As one scholar explained, Iran "feared the US might use Afghanistan as a base from which to launch a kinetic attack on Iran. The Taliban insurgency thus became viewed by Tehran as a tool with which to keep American forces preoccupied."⁷⁸

94. The U.S. government documented Iran's escalating support for the Taliban terrorists over the course of the United States' involvement in Afghanistan. In April 2007, General Peter Pace, Chairman of the U.S. Joint Chiefs of Staff, stated that Iranian explosives had

⁷⁷ *DCI Testimony: Converging Dangers in a Post 9/11 World*, Central Intelligence Agency (Feb. 6, 2002).

⁷⁸ Farhad Rezaei, *Iran and the Taliban: A Tactical Alliance?*, The Begin-Sadat Center for Strategic Studies (Jan. 15, 2019) ("*Iran and the Taliban: A Tactical Alliance?*").

been captured in Kandahar Province en route to the Taliban but acknowledged that it was not yet entirely clear who within Iran was responsible.⁷⁹ The next day, U.S. Assistant Secretary of State Richard Boucher described “a series of indicators that Iran is maybe getting more involved in an unhealthy way in Afghanistan.”⁸⁰

95. Those indicators rapidly grew in intensity, and soon there was little doubt that Iran was actively sponsoring the Taliban terrorists as a core part of its foreign policy. A purported May 2007 U.S. State Department cable (as published online), for example, reported that President Hamid Karzai had expressed concerns “over Iranian agents engaging Taliban and supplying them with weapons.” A purported July 2007 U.S. State Department cable (as published online) similarly reported that Taliban terrorists had received “light weapons and grenade launchers and bore the stamps of the Iranian factories where they were manufactured, primarily in 2006 and 2007.” The same cable explained that the fighters claimed they had received training in Iran and had been promised access to anti-aircraft rockets by Iranian officials. A purported military-intelligence summary the next month (as published online), reported on an “‘alarmingly rapid increase’ in Iranian presence in Afghanistan.”

96. When the U.S. Treasury Department designated the Qods Force as a FTO later that year, it confirmed that the “Qods Force provides weapons and financial support to the Taliban to support anti-U.S. and anti-Coalition activity in Afghanistan.”⁸¹ As the designation explained:

The Qods Force is the Iranian regime’s primary instrument for providing lethal support to the Taliban. The Qods Force provides weapons and financial support to the Taliban to

⁷⁹ Breffni O’Rourke, *Afghanistan: U.S. Says Iranian-Made Weapons Found*, RadioFreeEurope (Apr. 18, 2007).

⁸⁰ *Id.*

⁸¹ Press Release, U.S. Treasury Dep’t, *Fact Sheet: Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism* (Oct. 25, 2007).

support anti-U.S. and anti-Coalition activity in Afghanistan. Since at least 2006, Iran has arranged frequent shipments of small arms and associated ammunition, rocket propelled grenades, mortar rounds, 107mm rockets, plastic explosives, and probably man-portable defense systems to the Taliban. . . . Through Qods Force material support to the Taliban, we believe Iran is seeking to inflict casualties on U.S. and NATO forces.⁸²

97. Similar observations continued in 2008. According to the U.S. State Department's 2008 Country Reports on Terrorism: "The Qods Force, an elite branch of the Islamic Revolutionary Guard Corps (IRGC), is the regime's primary mechanism for cultivating and supporting terrorists abroad. The Qods Force provided aid in the form of weapons, training, and funding to HAMAS and other Palestinian terrorist groups, Lebanese Hizballah, Iraq-based militants, and Taliban fighters in Afghanistan."⁸³

98. The U.S. government's JIEDDO recognized in a 2009 report that "Iran's intentions are the same in both Iraq and Afghanistan: to develop, fund and arm proxy networks to leverage against the perceived U.S. aim of pursuing an active regime change doctrine in Iran."⁸⁴ Similarly, a purported January 2010 cable (as published online) explained that senior officials from the United Arab Emirates' State Security Department had accused Iran, through the IRGC, of supporting the Taliban by providing money and weapons, smuggling drugs, and facilitating the movement of Taliban leaders and fighters.

99. According to another purported February 2010 cable (as published online), President Karzai's Chief of Staff and former Ambassador to Iran, Omar Daudzai, reported that Iranian officials were no longer denying Iran's support for the Taliban in Afghanistan, instead remaining silent in the face of the assertion by the Government of Afghanistan.

⁸² *Id.*

⁸³ U.S. State Dep't, *Country Reports on Terrorism 2008* at 182-83 (Apr. 2009).

⁸⁴ *JIEDDO Report* at 5.

100. By April 2010, the U.S. Department of Defense reported that Iran was “covertly” supporting the Taliban. “Arms caches have been recently uncovered with large amounts of Iranian manufactured weapons, to include 107mm rockets, which we assess IRGC-QF delivered to Afghan militants.”⁸⁵ It further explained that “Tehran's support to the Taliban is inconsistent with their historic enmity, but fits with Iran’s strategy of backing many groups to ensure that it will have a positive relationship with the eventual leaders.”⁸⁶

101. On August 3, 2010, the U.S. Treasury Department – pursuant to Executive Order 13224 – designated General Hossein Musavi and Colonel Hasan Mortezaei, senior officials in the Qods Force, as SDGTs for their roles in supporting the Taliban.⁸⁷ General Musavi was the leader of the Ansar Corps, also known as the Fourth Corps, the branch of the Qods Force responsible for carrying out activities within Afghanistan.⁸⁸ The U.S. Treasury Department found that both General Musavi and Colonel Mortezaei, acting in their capacity as senior Qods Force officers, had provided “financial and material support to the Taliban.”⁸⁹ The U.S. Treasury Department further concluded that “the IRGC-QF provides select members of the Taliban with weapons, funding, logistics and training.”⁹⁰

102. General David Petraeus, then the Commander of the ISAF, testified before the Senate Armed Services Committee in March 2011 that Iran “without question” supplied

⁸⁵ Unclassified Report on Military Power of Iran (Apr. 2010), https://fas.org/man/eprint/dod_iran_2010.pdf.

⁸⁶ *Id.*

⁸⁷ Press Release, U.S. Treasury Dep’t, *Fact Sheet: U.S. Treasury Department Targets Iran’s Support for Terrorism Treasury Announces New Sanctions Against Iran’s Islamic Revolutionary Guard Corps-Qods Force Leadership* (Aug. 3, 2010).

⁸⁸ *Id.*

⁸⁹ *Id.*

⁹⁰ *Id.*

weapons, training, and funding to the Taliban in order to “make life difficult” for U.S. and NATO forces in Afghanistan.⁹¹

103. When the U.S. Department of Defense provided Congress with its Annual Report on Military Power of Iran in April 2012, it explained that, even though Iranian “support to the Taliban is inconsistent with their historic enmity, it complements Iran’s strategy of backing many groups to maximize its influence while also undermining U.S. and [NATO] objectives by fomenting violence.”⁹² By means of “the IRGC-QF, Iran provides material support to terrorist or militant groups such as . . . the Taliban.”⁹³ The U.S. Department of Defense characterized the support as part of a “grand strategy” to “challeng[e] U.S. influence.”⁹⁴

104. In its 2012 Report on Progress Toward Security and Stability in Afghanistan, the U.S. Department of Defense reported to Congress that Iran was engaging in “covert activities” in Afghanistan, including the provision of weapons and training to the Taliban.⁹⁵ As the report explained, “Since 2007, Coalition and Afghan forces have interdicted several shipments of Iranian weapons. Tehran’s relationship with the insurgency, although not ideologically based, is consistent with Iran’s short- to mid-term goal of undermining Coalition efforts and opposing the international military presence in Afghanistan.”⁹⁶

⁹¹ *The Situation in Afghanistan: Hr’g Before the S. Comm. On Armed Services*, 112 Cong. 40 (Mar. 15, 2011) (statement of General David Petraeus), <https://www.govinfo.gov/content/pkg/CHRG-112shrg72295/pdf/CHRG-112shrg72295.pdf>.

⁹² *Annual Report on Military Power of Iran 2* (Apr. 2012).

⁹³ *Id.* at 3.

⁹⁴ *Id.* at 1.

⁹⁵ U.S. Dep’t of Def., *Report on Progress Toward Security and Stability in Afghanistan* at 148 (Dec. 2012).

⁹⁶ *Id.*

105. Less than two years later, the U.S. Treasury Department concluded that the Qods Force “utilized now-detained Afghan associate, Sayyed Kamal Musavi, who was designated today, to plan and execute attacks in Afghanistan.” It further confirmed that “[t]wo IRGC-QF officers also designated today, Alireza Hemmati and Akbar Seyed Alhosseini, provided logistical support to this associate.”⁹⁷ Similarly, according to a Taliban commander in central Afghanistan in 2015: “Iran supplies us with whatever we need.”⁹⁸

106. Iran’s support for terrorist groups in Afghanistan has continued. The U.S. State Department stated in 2017 that “Iran is responsible for intensifying multiple conflicts and undermining the legitimate governments of, and U.S. interests in, Afghanistan”⁹⁹ The U.S. Department of Defense similarly confirmed that Iran “provides some support to the Taliban and Haqqani Network.”¹⁰⁰ In May 2018, U.S. Secretary of State Michael Pompeo publicly accused Iran of supporting the Taliban and other terrorist groups in Afghanistan.¹⁰¹

107. In October 2018, the U.S. Treasury Department, pursuant to Executive Order 13224, designated additional Qods Force officials “for acting for or on behalf of IRGC-QF and for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, the Taliban.”¹⁰² The U.S. Treasury Department

⁹⁷ Press Release, U.S. Treasury Dep’t, *Treasury Targets Networks Linked To Iran* (Feb. 6, 2014).

⁹⁸ Margherita Stancati, *Iran Backs Taliban With Cash And Arms*, Wall St. J. (June 11, 2015).

⁹⁹ *Country Reports on Terrorism 2017* at Foreword.

¹⁰⁰ U.S. Dep’t of Def., *Enhancing Security and Stability in Afghanistan at 21* (June 2017).

¹⁰¹ *Mike Pompeo speech: What are the 12 demands given to Iran?*, Al Jazeera News (May 21, 2018).

¹⁰² Press Release, U.S. Treasury Dep’t, *Treasury and the Terrorist Financing Targeting Center Partners Sanction Taliban Facilitators and their Iranian Supporters* (Oct. 23, 2018).

acted along with the six other member nations of the Terrorist Financing Targeting Center – a multinational, cooperative effort to combat terrorism in the Middle East.¹⁰³

108. The Secretary of Iran’s Supreme National Security Council, Ali Shamkhani, publicly acknowledged Iran’s support for the Taliban in January 2019, claiming that it was designed to “curb[] the security problems in Afghanistan.”¹⁰⁴

109. Consistent with this policy, Iran has provided material support or resources for the acts of extrajudicial killing that killed or injured Plaintiffs or their family members. As explained below, that support took the form of “currency . . . lodging, training, expert advice or assistance, . . . false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel, . . . and transportation.”¹⁰⁵

B. Iran Provided The Taliban With Weapons, Explosives, and Lethal Substances

110. Iran provided material support or resources for the acts of extrajudicial killing that killed or injured Plaintiffs, or their family members, by providing (among other things) weapons, explosives, and lethal substances to the Taliban. Many of the weapons Iran provided were designed to be particularly effective against U.S. and allied forces operating in Afghanistan. For example, Iran provided the Taliban with anti-tank mines, long range rockets, explosively formed penetrators, suicide vehicle-borne improvised explosive devices, rocket-propelled grenades, and explosives, which were uniquely suited for terrorist attacks on U.S. and allied forces.

¹⁰³ *Mike Pompeo speech: What are the 12 demands given to Iran?*, Al Jazeera News (May 21, 2018); Press Release, U.S. Treasury Dep’t, *U.S. and Saudi Arabia to Co-Chair New Terrorist Financing Targeting Center* (May 1, 2017).

¹⁰⁴ *Iran and the Taliban: A Tactical Alliance?*

¹⁰⁵ 18 U.S.C. § 2339A(b)(1).

111. U.S. and allied forces have seized large caches of Iran-made weapons and explosives in Afghanistan, many of which bore markings of Iranian origin. A purported April 2007 military-intelligence summary (as published online) reported that “Iranian officials” were sending “to Afghanistan explosive devices and vehicles ready to be used as SVBIEDs [suicide vehicle-borne improvised explosive devices].”¹⁰⁶ A purported U.S. government document August of that year (as published online) also reported that the Afghanistan National Police had found evidence of a planning meeting for 25 suicide attacks in which it was stated that “[t]he materials for the bombs will be supplied by Iran Government”

112. When the U.S. Treasury Department designated the Qods Force under Executive Order 13224 in October 2007, it specifically documented Iran’s frequent shipments of weapons to the Taliban over at least the prior year. A purported December 2007 military-intelligence summary (as published online) further reported that explosive samples in suicide vests seized from four suicide bombers “tasked by Taliban/Al-Qaeda leaders” with carrying out a suicide attack in Helmand province was found to be a 92% probability of a match against a suspected sample of Iran-sourced C4.

113. In January 2008, a raid by Afghan Police in Farah Province discovered 130 mines, of which the Afghan Police concluded 60 were Iran-made.¹⁰⁷ That same month the U.S. Ambassador to Afghanistan stated that “[t]here is no question that elements of insurgency have received weapons from Iran.”¹⁰⁸

¹⁰⁶ *Afghanistan War Logs: Anti-aircraft Missiles Clandestinely Transported From Iran Into Afghanistan – US Report*, The Guardian (July 25, 2010) (“*Anti-aircraft Missiles Clandestinely Transported*”); see also *Afghanistan War Logs: Afghan Government Seeking to Maintain Friendly Relations With Iran*, The Guardian (July 25, 2010) (referencing Iranian-made weapons recently found in Kandahar Province).

¹⁰⁷ *JIEDDO Report* at 10.

¹⁰⁸ Brian Bennett, *Iran Raises the Heat in Afghanistan*, Time (Feb. 22, 2008).

114. A purported June 2008 U.S. State Department cable (as published online) detailed multiple instances of Iran transferring arms to the Taliban in 2007 and 2008 and concluded that analysis of the weaponry “indicate the Taliban had access to Iranian weaponry produced as recently as 2006 and 2007.” Similarly, Afghan forces discovered a large cache of Iran-made explosives hidden near the Bakhshabad Dam in Farah Province in March 2009. That same month, a purported military-intelligence summary (as published online) indicated that Taliban commanders had obtained portable surface to air missiles that originated in Iran.

115. In May 2009, 44 bricks of Iran-made explosives and dozens of Iran-made mortars were discovered in a Taliban stronghold in Helmand Province. Also in May 2009, Afghanistan border police intercepted a shipment with dozens of anti-tank mines bound for Afghan militants. And in September 2009, a purported military-intelligence summary report (as published online) claimed that the Taliban had received “six very powerful anti-tank mines from Iran” to target ISAF forces or important Afghan Police Officers. That same year, the U.S. State Department reported that “[s]ince at least 2006, Iran has arranged arms shipments to select Taliban members, including small arms and associated ammunition, rocket-propelled grenades, mortar rounds, 107mm rockets, and plastic explosives.”¹⁰⁹

116. By 2011, Taliban terrorists were using Iran-made and -sourced long-range rockets to attack Coalition targets in Afghanistan. In February 2011, British forces intercepted more than four dozen 122-milimeter rockets in Nimruz Province near the Iranian border, which gave the terrorists roughly double the range to attack Coalition targets. British Foreign Secretary William Hague stated that “detailed technical analysis, together with the circumstances of the

¹⁰⁹ U.S. State Dep’t, *Country Reports on Terrorism 2009* at 192 (Aug. 2010).

seizure, leave us in no doubt that the weaponry recovered came from Iran.”¹¹⁰ The *Wall Street Journal* similarly reported that U.S. officials “said the rockets’ markings, and the location of their discovery, give them a ‘high degree’ of confidence that they came from the Revolutionary Guard’s overseas unit, the Qods Force.”¹¹¹ General Petraeus later confirmed that the Qods Force had supplied these rockets to a “known Taliban facilitator.”¹¹² The U.S. Department of Defense’s 2011 Report on Progress Toward Security and Stability in Afghanistan similarly stated that “[f]orensics teams examined the rockets and confirmed an Iranian point of origin.”¹¹³

117. In June 2015, Iran hired smugglers to ferry supplies across the Iranian border and delivered them to Taliban units in Afghanistan. These Iran-supplied weapons included 82mm mortars, light machine guns, AK-47 rifles, rocket-propelled grenades, and materials for making roadside bombs.

118. Iran also provided EFPs to the Taliban. EFPs are specially shaped charges, first used by Hezbollah in Lebanon, which typically employ a manufactured concave copper disk and an explosive-packed liner. In providing EFPs, Iran supplied the Taliban with a particularly lethal form of support. Indeed, Iran and Hezbollah designed EFPs to defeat armored vehicles like the ones used by Coalition forces in Afghanistan. Iran thus “smuggled [EFPs] to Afghan insurgents

¹¹⁰ Julian Borger & Richard Norton-Taylor, *British Special Forces Seize Iranian Rockets In Afghanistan*, *The Guardian* (Mar. 9, 2011).

¹¹¹ Jay Solomon, *Iran Funnels New Weapons to Iraq and Afghanistan*, *Wall St. J.* (July 2, 2011).

¹¹² *The Situation in Afghanistan: Hr’g Before the S. Comm. On Armed Services*, 112 Cong. 40 (Mar. 15, 2011) (statement of General David Petraeus), <https://www.govinfo.gov/content/pkg/CHRG-112shrg72295/pdf/CHRG-112shrg72295.pdf>.

¹¹³ U.S. Dep’t of Def., *Report on Progress Toward Security and Stability in Afghanistan* at 107 (Apr. 2011).

for use against U.S. Forces.”¹¹⁴ Those EFPs gave the Taliban a sophisticated anti-American weapon that it could not have obtained or deployed effectively on its own.

119. The Taliban began using EFPs against Coalition forces in 2007. A purported May 2007 U.S. State Department cable (as published online) reported on increased IED attacks and noted that recent attacks had been successful against armored ISAF vehicles, which indicated an Iran-supplied EFP. Just days later another purported cable (as published online) reported that two EFPs had been discovered in April 2007 in Herat Province. Through the summer of 2007, at least four EFPs were discovered in Herat Province, near other Iranian arms shipments.

120. A purported September 2007 cable (as published online) stated that British forces “in Farah Province, Afghanistan intercepted an arms convoy they had been tracking from inside Iran,” which included EFPs “of Iranian origin.” One week later, another purported cable (as published online) reported that, according to the U.K. Ambassador to NATO, Stewart Eldon, analysis of the munitions “showed a clear link to Iran and weapons the Iranian Revolutionary Guard Corps Qods Force has sent to insurgents in Iraq.” In 2008, the United Kingdom obtained proof that Iran was supplying the components for these EFPs.

121. By 2007, the JIEDDO concluded that Iran was attempting to “inflict psychological damage” on the United States by smuggling EFPs “to Afghan insurgents for use against U.S. Forces.”¹¹⁵

122. In Afghanistan, Iranian EFPs earned the nickname “Dragons” because the explosive force was concentrated in the direction of the designated target rather than blasting in all directions and dispersing the impact.¹¹⁶ Unlike ordinary mines that cause only minor damage

¹¹⁴ *JIEDDO Report* at 1.

¹¹⁵ *JIEDDO Report* at 3.

¹¹⁶ Kate Clark, *Taliban Claim Weapons Supplied By Iran*, *The Telegraph* (Sept. 14, 2008).

to U.S. military vehicles, a Dragon “superbomb” can completely destroy a military Humvee or tank.¹¹⁷ According to one Taliban commander, “If you lay an ordinary mine, it will only cause minor damage to Humvees or one of their big tanks. But if you lay a[n] [Iranian] Dragon, it will destroy it completely.”¹¹⁸

123. On information and belief, many Plaintiffs, or their family members, were severely injured or killed in terrorist attacks using Iran-supplied EFPs.

124. Iran also provided the Taliban with rockets and similar weapons that were particularly effective against U.S. and Coalition forces. A purported April 2007 military-intelligence summary (as published online), for example, reported that Iran had purchased anti-aircraft missiles from Algeria in late 2006 and then smuggled them from Mashhad, Iran – where the Fourth Corps of the Qods Force is headquartered – into Afghanistan.¹¹⁹ A purported Afghanistan Police Report from the next month (as published online) claimed that Iran intelligence sources issued three anti-aircraft launchers and ammunition to a Taliban commander. A purported March 2009 military intelligence summary (as published online) included intelligence reports of portable surface-to-air missiles arriving in Afghanistan from Iran. Similarly, a purported July 2009 military-intelligence summary (as published online) included reports of two dozen “Stinger” style surface-to-air missiles smuggled from Iran into Afghanistan.

125. According to a purported September 2009 military-intelligence summary (as published online), Taliban terrorists used an Iran-made rocket-propelled grenade launcher to shoot down Coalition helicopters. The launcher was marked “Made In Iran.” The launcher was

¹¹⁷ *Id.*

¹¹⁸ Steven O’Hern, *Iran’s Revolutionary Guard: The Threat That Grows While America Sleeps* at 112 (Potomac Books, 1st ed. 2012) (internal quotations and citation omitted); Kate Clark, *Taliban claim weapons supplied by Iran*, *The Telegraph* (Sept. 14, 2008).

¹¹⁹ *Anti-aircraft Missiles Clandestinely Transported*.

particularly effective because, unlike some other launchers, the Iran-made launcher had a scope that could be adjusted for targeting and was more accurate for shooting helicopters.

C. Iran Provided The Taliban With Lodging, Training, Expert Advice or Assistance, and Transportation

126. Iran also provided members of the Taliban and affiliated terrorist groups with lodging, training, expert advice or assistance, and transportation. Iran taught the Taliban attack techniques that were particularly effective against U.S. and Coalition forces.

127. According to a purported June 2006 military-intelligence summary (as published online), two members of the Iranian Intelligence Secret Service had arrived in Parwan Province to and help Taliban members “in carrying out terrorist attacks against the [Afghanistan] governmental authorities and the [Coalition forces] members, especially against the Americans forces.”¹²⁰ A purported military-intelligence summary later that year (as published online), reported that injured Taliban terrorists were evacuating to Tehran.¹²¹

128. Iran also trained Taliban fighters at camps within Iran. For example, a purported April 2007 military intelligence summary (as published online) reported that “Iranian officials train” members of the Taliban at an Iranian base in Birjand, Iran, near the Afghanistan border.¹²² A similar purported June 2007 military intelligence summary (as published online) claimed that the IRGC was training roughly 300 foreign fighters in Iran, presumably to fight in Afghanistan.

129. A purported military-intelligence summary (as published online) from May 2008 claimed that a Taliban commander had traveled to Iran for training and returned with forty

¹²⁰ *Afghanistan War Logs: US Claims Iran Spies Helping Insurgents to Attack Coalition Forces*, The Guardian (July 25, 2010).

¹²¹ *Afghanistan War Logs: Iranians Alleged to Be Sheltering Wounded Taliban Fighters in Tehran*, The Guardian (July 25, 2010).

¹²² *Anti-aircraft Missiles Clandestinely Transported*.

trained terrorists. Similarly, a military-intelligence summary (as published online) from July 2008 referenced “trained fighters moving in from Iran.” And a purported military-intelligence summary (as published online) from October 2009 likewise reported on the return of a Taliban commander from training “in an Iran army barracks.”

130. Iran provided Taliban terrorists with specialized training on how best to deploy Iran-supplied weapons against U.S. and Coalition forces. A purported December 2008 military-intelligence summary (as published online) reported on a group of 40 insurgents “who allegedly were trained in an Iranian Military base” who had plans to attack the capital of Farah Province using weapons that “Iran Intelligence could have provided.” According to a purported April 2009 military-intelligence summary (as published online), Iran was recruiting Taliban terrorists for training in Iran on shooting down Coalition helicopters. And another purported April 2009 military-intelligence summary (as published online), reported on the return of a Taliban commander after receiving IED-manufacturing training in Iran.

131. A March 21, 2010 article in London’s *The Sunday Times* reported extensively on Iranian security officials training Taliban recruits to “ambush” Coalition forces, attack checkpoints, and use guns and IEDs. The *Times* interviewed two Taliban commanders – from Wardak and Ghanzi province – who had traveled to Iran with groups of Taliban terrorists for training, which improved their ability to launch lethal attacks on Coalition forces. According to the commanders, Iran paid for this training. One commander who received training in Iran observed that the Taliban’s and Iran’s “religions and . . . histories are different, but our target is the same — we both want to kill Americans.”¹²³

¹²³ Miles Amoores, *Iranian military teaches Taliban fighters the art of ambush*, *The Times* (Mar. 21, 2010).

132. By 2009, U.S. government officials were openly accusing the IRGC of training the Taliban. In an August 2009 report, ISAF Commander General Stanley McChrystal explained that “the Iranian Qods Force is reportedly training fighters for certain Taliban groups and providing other forms of military assistance to insurgents.”¹²⁴ He confirmed again in May 2010 that Iran was training Afghan fighters in Iran.¹²⁵ In its 2009 Country Reports on Terrorism, the U.S. State Department reported: “Iran’s Qods Force provided training to the Taliban in Afghanistan on small unit tactics, small arms, explosives, and indirect fire weapons”¹²⁶ Similarly, in 2012 it explained: “the IRGC-QF trained Taliban elements on small unit tactics, small arms, explosives, and indirect fire weapons, such as mortars, artillery, and rockets.”¹²⁷

133. Iran’s training of Taliban terrorists has not diminished. By 2015, the IRGC was operating at least four Taliban training camps within Iran.

134. Iran also facilitated the Taliban’s attacks by allowing the Taliban to establish offices in Iran. For example, Iran permitted a senior leader of the Taliban to set up an office in Zahedan, Iran, near the borders with Afghanistan and Pakistan. In or about 2014, the Taliban also opened an office in Mashhad, Iran, where the Fourth Corps of the Qods Force is headquartered.¹²⁸ As of January 2019, the Taliban maintained an office in Tehran, Iran.¹²⁹

135. Mohammad Arif Shahjahan, the governor of Farah Province in western Afghanistan, told Radio Free Afghanistan in 2017 that Taliban leaders had been traveling

¹²⁴ Quoted by Sajjan M. Gohel, in *Iran’s Ambiguous Role in Afghanistan* at 13, CTC Sentinel (March 2010).

¹²⁵ *Killing Americans and Their Allies*.

¹²⁶ U.S. State Dep’t, *Country Reports on Terrorism 2009* at 192 (Aug. 2010).

¹²⁷ U.S. State Dep’t, *Country Reports on Terrorism 2012* at 196 (May 2013).

¹²⁸ Oved Lobel, *Afghanistan: The Forgotten Front Against Iran*, Australia/Israel & Jewish Affairs Council (Nov. 16, 2018).

¹²⁹ *Iran and the Taliban: A Tactical Alliance?*

frequently to Iran, where they receive protection and support.¹³⁰ He reported that Qods Force operatives had recently met with and advised the Taliban in Farah Province.¹³¹

136. Iran's training of Taliban terrorists in small unit tactics, small arms, explosives, indirect fire, and other techniques enabled the Taliban to more effectively attack U.S. forces and Coalition forces. The Taliban and affiliated terrorist groups in Afghanistan have used Iran's training to kill or injure Plaintiffs or their family members.

D. Iran Provided Financial Support To The Taliban

137. Iran has also financially supported the Taliban. On an annual basis, Iran provided millions in money to the Taliban to fund operations, and Iran regularly provided large cash payments to the Taliban. For example, a purported February 2005 military intelligence summary (as published online) reported that the IRGC delivered 10 million Afghanis (worth roughly \$212,000) to a location on Iran's border where the money was transferred to four members of a Taliban associated terrorist group.¹³²

138. Iran also directly paid Taliban insurgents to kill U.S. forces. Another purported February 2005 military-intelligence summary (as published online) reported on a Taliban group that was being paid by the Iranian government \$1,740 for each Afghanistan soldier killed and \$3,481 for each Government of Afghanistan official killed. The report further explained that the group would begin attacking U.S. forces if the attacks were successful.¹³³ Iran paid Taliban terrorists an estimated \$1,000 for each U.S. soldier murdered in Afghanistan and \$6,000 for each

¹³⁰ Abubakar Siddique & Noorullah Shayan, *Mounting Afghan Ire Over Iran's Support For Taliban*, Gandhara (July 31, 2017).

¹³¹ *Id.*

¹³² *Afghanistan War Logs: Iran Smuggles Money into Afghanistan to Fund Insurgents*, says US Report, The Guardian (July 25, 2010).

¹³³ *Afghanistan War Logs: Iran Offers Reward for Each Afghan Official and Solider Killed*, According to Coalition Report, The Guardian (July 25, 2010).

destroyed American military vehicle. In one specific example, Taliban fighters received \$18,000 from Iran as a reward for an attack in 2010 that killed several Afghan forces and destroyed an American armored vehicle.¹³⁴

139. Iran also provided funding to Taliban commanders, often as they were returning to Afghanistan from training in Iran. A purported May 2008 military-intelligence summary (as published online) reported on a Taliban leader returning from training in Iran “along with a considerable amount of money.” A purported May 2009 U.S. State Department Cable (as published online) stated that the IRGC may provide Taliban Commander Mullah Sangin with financial support to engage Coalition forces, including U.S. contractors.

140. Iran has also supported the Taliban’s finances by supporting its ability to traffic narcotics, which the Taliban relies on “to finance their acts of terror and violence.”¹³⁵ As the U.S. Treasury Department explained when it designated Iranian Qods Force General Gholamreza Baghbani as a Specially Designated Narcotics Trafficker in March 2012, General Baghbani, allowed Afghan narcotics traffickers to smuggle opiates through Iran, facilitated the smuggling of chemicals necessary to produce heroin from Iran into Afghanistan and helped “facilitate shipments of opium into Iran.”¹³⁶ General Baghbani had narcotics traffickers deliver weapons on his behalf to the Taliban.¹³⁷

141. As reported in a 2015 *Wall Street Journal* article, a Taliban commander described Iran’s financial support for the Taliban by recruiting and paying individual terrorists. The

¹³⁴ Miles Amore, *Iran pays the Taliban to Kill US Soldiers*, *The Times* (Sept. 5, 2010).

¹³⁵ Press Release, U.S. Treasury Dep’t, *Treasury Targets Taliban Shadow Governor of Helmand Afghanistan as Narcotics Trafficker* (Nov. 15, 2012).

¹³⁶ Press Release, U.S. Treasury Dep’t, *Treasury Designates Iranian Qods Force General Overseeing Afghan Heroin Trafficking Through Iran* (Mar. 7, 2012).

¹³⁷ *Id.*

commander explained that he had been detained for working illegally in Iran when he was approached by the IRGC and was offered double his previous salary – to be paid by Iran – if he fought with the Taliban in Afghanistan.¹³⁸ And in 2017, officials in Ghor Province accused Iran of financing a Taliban offensive that briefly enabled the Taliban to overtake a key district.¹³⁹

E. Iran Provided Material Support To Al-Qaeda

142. Iran has also long provided material support to al-Qaeda. As with the Taliban, the sectarian differences between the Shiite regime in Tehran and the Sunni al-Qaeda leadership have not hindered cooperation between the groups. Whatever their religious differences, both groups share a hatred of America and support anti-American violence.

143. Iran has supported al-Qaeda’s terrorist activities since the early 1990s, when Osama bin Laden lived in Sudan. Senior al-Qaeda operatives traveled to Iran and Lebanon during this period to camps, run by Hezbollah and sponsored by the Qods Force, and received explosives training that enabled al-Qaeda to launch large-scale terrorist attacks on American embassies in Africa. According to one senior al-Qaeda official, trainers at this time were already researching how to develop shaped charges to pierce armor plating – the technology later perfected in EFPs.

144. When the U.S. government indicted Osama bin Laden for the 1998 bombings of the U.S. embassies in Kenya and Tanzania, the indictment alleged that al-Qaeda had “forged alliances” with “the government of Iran and its associated terrorist group Hezbollah [sic] for the purpose of working together against their perceived common enemies in the West, particularly

¹³⁸ Margherita Stancati, *Iran Backs Taliban With Cash And Arms*, Wall St. J. (June 11, 2015).

¹³⁹ Abubakar Siddique & Noorullah Shayan, *Mounting Afghan Ire Over Iran’s Support For Taliban*, Gandhara (July 31, 2017).

the United States.”¹⁴⁰ A court in this District subsequently found that Iran had caused the East Africa Embassy bombing by materially supporting al-Qaeda’s operations.¹⁴¹

145. Following the September 11, 2001 attacks on the United States, Iran provided safe harbor to many senior leaders of al-Qaeda and their families, including Osama bin Laden’s sons. Iran permitted these senior leaders to move freely within Iran in the early 2000s, while they continued to direct, organize, and support al-Qaeda’s terrorist operations throughout the world.¹⁴²

146. In 2007, Osama bin Laden discouraged terrorist attacks against Iran because of its historical support for al-Qaeda’s terrorist operations and referred to Iran as al-Qaeda’s “main artery for funds, personnel, and communication.”¹⁴³ Similarly, a letter reportedly written by al-Qaeda’s second in command, Ayman al-Zawahiri, thanked the IRGC for its support in setting up al-Qaeda’s terrorist network in Yemen in 2008.

147. In 2012, the Council on Foreign Relations reported that “al-Qaeda has stepped up its cooperation on logistics and training with Hezbollah, a radical, Iran-backed Lebanese militia drawn from the minority Shiite strain of Islam.”¹⁴⁴

¹⁴⁰ Indictment at 3, *United States v. Bin Laden*, No. 1:98-cr-00539-LAK (S.D.N.Y. filed Nov. 5, 1998), Dkt. 1, available at <https://fas.org/irp/news/1998/11/indict1.pdf>.

¹⁴¹ See *Owens v. Republic of Sudan*, 826 F. Supp. 2d 128, 151 (D.D.C. 2011).

¹⁴² *Id.*

¹⁴³ October 18, 2007 translated letter from Osama bin Laden to Karim at 1, *Bin Laden’s Bookshelf*, Office of the Director of National Intelligence, <https://www.dni.gov/files/documents/ubl2016/english/Letter%20to%20Karim.pdf>. In March 2016, the Office of the Director of National Intelligence declassified items that had been obtained by U.S. special operators in the May 2011 raid on bin Laden’s compound, including this letter. See *Bin Laden’s Bookshelf*, Office of the Director of National Intelligence, <https://www.dni.gov/index.php/features/bin-laden-s-bookshelf?start=2>.

¹⁴⁴ *al-Qaeda (a.k.a. al-Qaida, al-Qa`ida)*, Council on Foreign Relations (June 6, 2012), <https://www.cfr.org/background/al-qaeda-aka-al-qaida-al-qaida>.

148. The U.S. government has also recognized these connections. In July 2011, the U.S. Treasury Department designated as SDGTs six members of al-Qaeda operating in Iran under a secret agreement between Iran and al-Qaeda.¹⁴⁵ The agreement provided that al-Qaeda “must refrain from conducting any operations within Iranian territory and recruiting operatives inside Iran while keeping Iranian authorities informed of their activities. In return, the Government of Iran gave the Iran-based al-Qa`ida network freedom of operation and uninhibited ability to travel for extremists and their families.” Al-Qaeda has honored its commitment to Iran despite its attacks on Shi’a Muslims elsewhere in the Middle East.

149. The U.S. Treasury Department has repeatedly recognized the link between al-Qaeda and Iran in making SDGT designations under Executive Order 13224. In February 2012, the agency designated the Iranian Ministry of Intelligence and Security as a terrorist-sponsoring entity for, among other things, supporting al-Qaeda.¹⁴⁶ In 2014, the agency likewise designated a “key Iran-based” al-Qaeda facilitator who has “assisted extremists and operatives transiting Iran on their way into and out of Pakistan and Afghanistan.”¹⁴⁷

150. The close relationship between al-Qaeda and Iran has continued in recent years. In 2017, the U.S. State Department explained, “Since at least 2009, Iran has allowed AQ facilitators to operate a core facilitation pipeline through the country, enabling AQ to move funds and fighters to South Asia and Syria.”¹⁴⁸ It further accused Iran of remaining unwilling to bring

¹⁴⁵ Press Release, U.S. Treasury Dep’t, *Treasury Targets Al-Qa`ida Funding and Support Network Using Iran as a Critical Transit Point* (July 28, 2011).

¹⁴⁶ Press Release, U.S. Treasury Dep’t, *Treasury Designates Iranian Ministry of Intelligence and Security for Human Rights Abuses and Support for Terrorism* (Feb. 16, 2012).

¹⁴⁷ Press Release, U.S. Treasury Dep’t, *Treasury Targets Networks Linked To Iran* (Feb. 6, 2014).

¹⁴⁸ U.S. State Dep’t, *Country Reports on Terrorism 2016* at Iran Section (July 2017).

to justice or identify al-Qaeda members in its custody.¹⁴⁹ The next year, the agency reaffirmed those conclusions and reiterated Iran's close relationship with al-Qaeda.¹⁵⁰

151. As alleged above, the mafia-style "syndicate" of which both the Taliban and al-Qaeda formed a part made attacks by both groups more lethal. Iran's mutually reinforcing support for both the Taliban and al-Qaeda made both organizations more effective.

152. By supporting al-Qaeda, Iran provided material support and resources for the extrajudicial killings that killed or injured Plaintiffs or members of their families. Al-Qaeda directly participated in many of the attacks that killed or injured Plaintiffs or their family members. Moreover, al-Qaeda was closely intertwined with the Taliban and associated terrorist groups acting in Afghanistan, and al-Qaeda planned and authorized the Taliban attacks in which it did not directly participate. Material support and resources provided to al-Qaeda thus flowed to the Taliban, causing the injury and death of plaintiffs or their family members.

IV. THE TALIBAN KILLED AND INJURED PLAINTIFFS THROUGH TERRORIST ATTACKS FOR WHICH IRAN PROVIDED MATERIAL SUPPORT OR RESOURCES

153. Plaintiffs are members of the U.S. military, U.S. government employees, and U.S. government contractors serving in Afghanistan, and their family members, who were killed or injured in terrorist attacks conducted by the Taliban in conjunction with al-Qaeda and affiliated terrorist groups. Iran's provision of material support or resources for these acts of extrajudicial killing caused Plaintiffs' personal injuries or deaths.

¹⁴⁹ *Id.*

¹⁵⁰ *Country Reports on Terrorism 2017* at Foreword.

The David E. Cabrera Family

154. Lieutenant Colonel David E. Cabrera served in Afghanistan as a member of the U.S. Army. On October 29, 2011, LTC Cabrera was injured in a suicide bombing attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. LTC Cabrera died on October 29, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

155. LTC Cabrera was a national of the United States at the time of the attack and his death.

156. Plaintiff August Cabrera is the widow of LTC Cabrera. She is a national of the United States.

157. Plaintiff M.G.C., by and through his next friend August Cabrera, is the minor son of LTC Cabrera. He is a national of the United States.

158. Plaintiff R.X.C., by and through his next friend August Cabrera, is the minor son of LTC Cabrera. He is a national of the United States.

159. Plaintiff Corbin Cabrera is the son of LTC Cabrera. He is a national of the United States.

160. Plaintiff Gillian Leigh Cabrera is the daughter of LTC Cabrera. She is a national of the United States.

161. Plaintiff Robert Cabrera is the father of LTC Cabrera. He is a national of the United States.

162. Plaintiff Suzanne Renae Martinez is the sister of LTC Cabrera. She is a national of the United States.

163. Plaintiff JD Prosser is the sister of LTC Cabrera. She is a national of the United States.

164. As a result of the death of LTC Cabrera, each member of the Cabrera Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LTC Cabrera's society, companionship, and counsel.

The Ryan C. Adams Family

165. Sergeant Ryan C. Adams served in Afghanistan as a member of the U.S. Army National Guard. On October 2, 2009, SGT Adams was injured in a rocket propelled grenade attack committed by the Haqqani Network, a part of the Taliban, in Logar Province, Afghanistan. SGT Adams died on October 2, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

166. SGT Adams was a national of the United States at the time of the attack and his death.

167. Plaintiff Peter Adams is the father of SGT Adams. He is a national of the United States.

168. As a result of the death of SGT Adams, each member of the Adams Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Adams's society, companionship, and counsel.

The Raymond C. Alcaraz Family

169. Sergeant Raymond C. Alcaraz served in Afghanistan as a member of the U.S. Army. On August 31, 2010, SGT Alcaraz was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Logar Province, Afghanistan. SGT Alcaraz died on

August 31, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

170. SGT Alcaraz was a national of the United States at the time of the attack and his death.

171. Plaintiff Alma Murphy is the mother of SGT Alcaraz. She is a national of the United States.

172. Plaintiff Lucas Gonzales is the brother of SGT Alcaraz. He is a national of the United States.

173. Plaintiff Paul Murphy is the step-father of SGT Alcaraz. He is a national of the United States. Paul Murphy lived in the same household as SGT Alcaraz for a substantial period of time and considered SGT Alcaraz the functional equivalent of a biological son.

174. As a result of the death of SGT Alcaraz, each member of the Alcaraz Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Alcaraz's society, companionship, and counsel.

The William Allen Family

175. William Allen served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On September 6, 2010, Mr. Allen was injured in an insider attack committed by the Taliban in Kandahar Province, Afghanistan. Mr. Allen died on September 6, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

176. Mr. Allen was a national of the United States at the time of the attack and his death.

177. Plaintiff Ginny Lamb is the sister of Mr. Allen. She is a national of the United States.

178. Plaintiff Sherry Loan is the sister of Mr. Allen. She is a national of the United States.

179. Plaintiff Linda Phaneuf is the sister of Mr. Allen. She is a national of the United States.

180. As a result of the death of Mr. Allen, each member of the Allen Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Allen's society, companionship, and counsel.

The Billy G. Anderson Family

181. Private First Class Billy G. Anderson served in Afghanistan as a member of the U.S. Army. On May 17, 2010, PFC Anderson was injured in an IED attack committed by the Taliban in Badghis Province, Afghanistan. PFC Anderson died on May 17, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

182. PFC Anderson was a national of the United States at the time of the attack and his death.

183. Plaintiff Caitlin Elizabeth Anderson is the widow of PFC Anderson. She is a national of the United States.

184. Plaintiff L.G.A., by and through her next friend Caitlin Elizabeth Anderson, is the minor daughter of PFC Anderson. She is a national of the United States.

185. Plaintiff Bobby Gene Anderson is the father of PFC Anderson. He is a national of the United States.

186. Plaintiff Patricia Marlene Goodwin is the mother of PFC Anderson. She is a national of the United States.

187. Plaintiff April Lynn Anderson is the sister of PFC Anderson. She is a national of the United States.

188. Plaintiff Bobby Joe Anderson is the brother of PFC Anderson. He is a national of the United States.

189. Plaintiff John David Anderson is the brother of PFC Anderson. He is a national of the United States.

190. As a result of the death of PFC Anderson, each member of the Anderson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Anderson's society, companionship, and counsel.

The Brian M. Anderson Family

191. Specialist Brian M. Anderson served in Afghanistan as a member of the U.S. Army. On June 12, 2010, SPC Anderson was injured in an IED attack committed by the Taliban in Kunduz Province, Afghanistan. SPC Anderson died on June 12, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

192. SPC Anderson was a national of the United States at the time of the attack and his death.

193. Plaintiff Margaret Anderson is the mother of SPC Anderson. She is a national of the United States.

194. As a result of the death of SPC Anderson, each member of the Anderson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Anderson's society, companionship, and counsel.

The Carlos A. Aragon Family

195. Lance Corporal Carlos A. Aragon served in Afghanistan as a member of the U.S. Marine Corps Reserves. On March 1, 2010, LCpl Aragon was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Aragon died on March 1, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

196. LCpl Aragon was a national of the United States at the time of the attack and his death.

197. Plaintiff Rosa Irma Halliday is the mother of LCpl Aragon. She is a national of the United States.

198. Plaintiff Armando Ochoa is the brother of LCpl Aragon. He is a national of the United States.

199. Plaintiff Eduardo Ochoa is the brother of LCpl Aragon. He is a national of the United States.

200. Plaintiff Brad Joseph Halliday is the step-father of LCpl Aragon. He is a national of the United States. Brad Joseph Halliday lived in the same household as LCpl Aragon for a substantial period of time and considered LCpl Aragon the functional equivalent of a biological son.

201. As a result of the death of LCpl Aragon, each member of the Aragon Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Aragon's society, companionship, and counsel.

The Bradley W. Atwell Family

202. Sergeant Bradley W. Atwell served in Afghanistan as a member of the U.S. Marine Corps. On September 15, 2012, Sgt Atwell was injured in an insider attack committed by the Taliban in Helmand Province, Afghanistan. Sgt Atwell died on September 15, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

203. Sgt Atwell was a national of the United States at the time of the attack and his death.

204. Plaintiff Cheryl Atwell is the mother of Sgt Atwell. She is a national of the United States.

205. Plaintiff Erin Riedel is the sister of Sgt Atwell. She is a national of the United States.

206. As a result of the death of Sgt Atwell, each member of the Atwell Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Sgt Atwell's society, companionship, and counsel.

The David R. Baker Family

207. Lance Corporal David R. Baker served in Afghanistan as a member of the U.S. Marine Corps. On October 20, 2009, LCpl Baker was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Baker died on October 20, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

208. LCpl Baker was a national of the United States at the time of the attack and his death.

209. Plaintiff Mark Baker is the father of LCpl Baker. He is a national of the United States.

210. Plaintiff Mark David Baker is the brother of LCpl Baker. He is a national of the United States.

211. Plaintiff Taylor Genovese is the sister of LCpl Baker. She is a national of the United States.

212. Plaintiff Rebecca E. Baker is the step-mother of LCpl Baker. She is a national of the United States. Rebecca E. Baker lived in the same household as LCpl Baker for a substantial period of time and considered LCpl Baker the functional equivalent of a biological son.

213. As a result of the death of LCpl Baker, each member of the Baker Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Baker's society, companionship, and counsel.

The Dillon C. Baldrige Family

214. Sergeant Dillon C. Baldrige served in Afghanistan as a member of the U.S. Army. On June 10, 2017, SGT Baldrige was injured in an insider attack committed by the Taliban in Nangarhar Province, Afghanistan. SGT Baldrige died on June 10, 2017 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

215. SGT Baldrige was a national of the United States at the time of the attack and his death.

216. Plaintiff Christopher Baldrige is the father of SGT Baldrige. He is a national of the United States.

217. Plaintiff E.B., by and through his next friend Christopher Baldrige, is the minor brother of SGT Baldrige. He is a national of the United States.

218. Plaintiff L.B., by and through his next friend Christopher Baldrige, is the minor brother of SGT Baldrige. He is a national of the United States.

219. Plaintiff S.B., by and through her next friend Christopher Baldrige, is the minor sister of SGT Baldrige. She is a national of the United States.

220. Plaintiff Jessie Baldrige is the step-mother of SGT Baldrige. She is a national of the United States. Jessie Baldrige lived in the same household as SGT Baldrige for a substantial period of time and considered SGT Baldrige the functional equivalent of a biological son.

221. As a result of the death of SGT Baldrige, each member of the Baldrige Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Baldrige's society, companionship, and counsel.

The Kevin B. Balduf Family

222. Sergeant Kevin B. Balduf served in Afghanistan as a member of the U.S. Marine Corps. On May 12, 2011, Sgt Balduf was injured in an insider attack committed by the Taliban in Helmand Province, Afghanistan. Sgt Balduf died on May 12, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

223. Sgt Balduf was a national of the United States at the time of the attack and his death.

224. Plaintiff Virginia Newsom is the mother of Sgt Balduf. She is a national of the United States.

225. Plaintiff Kyle Balduf is the brother of Sgt Balduf. He is a national of the United States.

226. As a result of the death of Sgt Balduf, each member of the Balduf Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Sgt Balduf's society, companionship, and counsel.

The Brandon A. Barrett Family

227. Captain Brandon A. Barrett served in Afghanistan as a member of the U.S. Marine Corps. On May 5, 2010, Capt Barrett was injured in a sniper attack committed by the Taliban in Helmand Province, Afghanistan. Capt Barrett died on May 5, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

228. Capt Barrett was a national of the United States at the time of the attack and his death.

229. Plaintiff Brett Barrett is the father of Capt Barrett. He is a national of the United States.

230. As a result of the death of Capt Barrett, each member of the Barrett Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Capt Barrett's society, companionship, and counsel.

The William M. Bays Family

231. Sergeant William M. Bays served in Afghanistan as a member of the U.S. Army. On June 10, 2017, SGT Bays was injured in an insider attack committed by the Taliban in Nangarhar Province, Afghanistan. SGT Bays died on July 10, 2017 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

232. SGT Bays was a national of the United States at the time of the attack and his death.

233. Plaintiff April Angel Bays is the mother of SGT Bays. She is a national of the United States.

234. Plaintiff Timothy Lee Bays is the father of SGT Bays. He is a national of the United States.

235. Plaintiff Brenda Griner is the sister of SGT Bays. She is a national of the United States.

236. Plaintiff Lindsay Redoutey is the sister of SGT Bays. She is a national of the United States.

237. As a result of the death of SGT Bays, each member of the Bays Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Bays's society, companionship, and counsel.

The Thomas A. Baysore Jr. Family

238. Staff Sergeant Thomas A. Baysore Jr. served in Afghanistan as a member of the U.S. Army. On September 26, 2013, SSG Baysore was injured in an insider attack involving small arms fire committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Paktia Province, Afghanistan. SSG Baysore died on September 26, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

239. SSG Baysore was a national of the United States at the time of the attack and his death.

240. Plaintiff Angela Fritzges is the sister of SSG Baysore. She is a national of the United States.

241. As a result of the death of SSG Baysore, each member of the Baysore Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Baysore's society, companionship, and counsel.

The Vincent J. Bell Family

242. Staff Sergeant Vincent J. Bell served in Afghanistan as a member of the U.S. Marine Corps. On November 30, 2011, SSgt Bell was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSgt Bell died on November 30, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

243. SSgt Bell was a national of the United States at the time of the attack and his death.

244. Plaintiff James Bell is the father of SSgt Bell. He is a national of the United States.

245. Plaintiff Pamela E. Alexander Bell is the mother of SSgt Bell. She is a national of the United States.

246. Plaintiff London Jacinda Bell is the sister of SSgt Bell. She is a national of the United States.

247. Plaintiff Andrea Roe is the sister of SSgt Bell. She is a national of the United States.

248. As a result of the death of SSgt Bell, each member of the Bell Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Bell's society, companionship, and counsel.

The Darrik C. Benson Family

249. Special Warfare Operator Petty Officer 1st Class Darrik C. Benson served in Afghanistan as a member of the U.S. Navy. On August 6, 2011, SO1 (SEAL) Benson was injured in an attack on a Chinook helicopter committed by the Haqqani Network, a part of the

Taliban, in Wardak Province, Afghanistan. SO1 (SEAL) Benson died on August 6, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

250. SO1 (SEAL) Benson was a national of the United States at the time of the attack and his death.

251. Plaintiff Frederick C. Benson is the father of SO1 (SEAL) Benson. He is a national of the United States.

252. Plaintiff Beverly Mills is the mother of SO1 (SEAL) Benson. She is a national of the United States.

253. As a result of the death of SO1 (SEAL) Benson, each member of the Benson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SO1 (SEAL) Benson's society, companionship, and counsel.

The Brett Benton Family

254. Brett Benton served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On June 4, 2011, Mr. Benton was injured in an IED attack committed by the Taliban in Laghman Province, Afghanistan. Mr. Benton died on June 4, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

255. Mr. Benton was a national of the United States at the time of the attack and his death.

256. Plaintiff Bethany Ann Benton is the widow of Mr. Benton. She is a national of the United States.

257. As a result of the death of Mr. Benton, each member of the Benton Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Benton's society, companionship, and counsel.

The Julian L. Berisford Family

258. Specialist Julian L. Berisford served in Afghanistan as a member of the U.S. Army. On November 4, 2009, SPC Berisford was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SPC Berisford died on November 4, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

259. SPC Berisford was a national of the United States at the time of the attack and his death.

260. Plaintiff Gina Berisford is the widow of SPC Berisford. She is a national of the United States.

261. Plaintiff M.B., by and through her next friend Gina Berisford, is the minor daughter of SPC Berisford. She is a national of the United States.

262. Plaintiff Shelley Guthrie is the mother of SPC Berisford. She is a national of the United States.

263. As a result of the death of SPC Berisford, each member of the Berisford Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Berisford's society, companionship, and counsel.

The Richard J. Berrettini Family

264. Lieutenant Colonel Richard J. Berrettini served in Afghanistan as a member of the U.S. Army National Guard. On January 2, 2008, LTC Berrettini was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Khost Province, Afghanistan. LTC Berrettini died on January 11, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

265. LTC Berrettini was a national of the United States at the time of the attack and his death.

266. Plaintiff Jane Berrettini is the widow of LTC Berrettini. She is a national of the United States.

267. Plaintiff Vincent Berrettini is the son of LTC Berrettini. He is a national of the United States.

268. As a result of the death of LTC Berrettini, each member of the Berrettini Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LTC Berrettini's society, companionship, and counsel.

The Cory J. Bertrand Family

269. Specialist Cory J. Bertrand served in Afghanistan as a member of the U.S. Army. On October 14, 2008, SPC Bertrand was injured in an IED attack committed by the Taliban in Kunar Province, Afghanistan. SPC Bertrand died on October 14, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

270. SPC Bertrand was a national of the United States at the time of the attack and his death.

271. Plaintiff Charlotte Allen is the mother of SPC Bertrand. She is a national of the United States.

272. Plaintiff Austin Nelams is the brother of SPC Bertrand. He is a national of the United States.

273. Plaintiff Matthew Allen is the step-father of SPC Bertrand. He is a national of the United States. Matthew Allen lived in the same household as SPC Bertrand for a substantial period of time and considered SPC Bertrand the functional equivalent of a biological son.

274. As a result of the death of SPC Bertrand, each member of the Bertrand Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Bertrand's society, companionship, and counsel.

The Jeremy E. Bessa Family

275. Staff Sergeant Jeremy E. Bessa served in Afghanistan as a member of the U.S. Army. On February 20, 2009, SSG Bessa was injured in an IED attack committed by the Taliban in Uruzgan Province, Afghanistan. SSG Bessa died on February 20, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

276. SSG Bessa was a national of the United States at the time of the attack and his death.

277. Plaintiff Julie Bessa is the mother of SSG Bessa. She is a national of the United States.

278. Plaintiff Joel D. Bessa is the brother of SSG Bessa. He is a national of the United States.

279. As a result of the death of SSG Bessa, each member of the Bessa Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Bessa's society, companionship, and counsel.

The John D. Blair Family

280. First Sergeant John D. Blair served in Afghanistan as a member of the U.S. Army National Guard. On June 20, 2009, 1SG Blair was injured in a rocket propelled grenade attack committed by the Haqqani Network, a part of the Taliban, in Khost Province, Afghanistan. 1SG Blair died on June 20, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

281. 1SG Blair was a national of the United States at the time of the attack and his death.

282. Plaintiff Donna Blair is the widow of 1SG Blair. She is a national of the United States.

283. Plaintiff Dallas Bryant is the step-son of 1SG Blair. He is a national of the United States. Dallas Bryant lived in the same household as 1SG Blair for a substantial period of time and considered 1SG Blair the functional equivalent of a biological father.

284. Plaintiff Georgia Priest is the step-daughter of 1SG Blair. She is a national of the United States. Georgia Priest lived in the same household as 1SG Blair for a substantial period of time and considered 1SG Blair the functional equivalent of a biological father.

285. As a result of the death of 1SG Blair, each member of the Blair Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1SG Blair's society, companionship, and counsel.

The Joshua C. Blaney Family

286. Sergeant Joshua C. Blaney served in Afghanistan as a member of the U.S. Army. On December 12, 2007, SGT Blaney was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SGT Blaney died on December 12, 2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

287. SGT Blaney was a national of the United States at the time of the attack and his death.

288. Plaintiff Charles Edward Blaney is the father of SGT Blaney. He is a national of the United States.

289. Plaintiff Dianne Belk Massey is the mother of SGT Blaney. She is a national of the United States.

290. Plaintiff Carley Blaney is the sister of SGT Blaney. She is a national of the United States.

291. As a result of the death of SGT Blaney, each member of the Blaney Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Blaney's society, companionship, and counsel.

The Jason M. Bogar Family

292. Corporal Jason M. Bogar served in Afghanistan as a member of the U.S. Army. On July 13, 2008, CPL Bogar was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Taliban and al-Qaeda, a designated FTO at the time of the attack, in Nuristan Province, Afghanistan. CPL Bogar died on July 13, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

293. CPL Bogar was a national of the United States at the time of the attack and his death.

294. Plaintiff Carlene Cross is the mother of CPL Bogar. She is a national of the United States.

295. Plaintiff Micael D. Bogar is the sister of CPL Bogar. She is a national of the United States.

296. Plaintiff Carise Martindale is the sister of CPL Bogar. She is a national of the United States.

297. As a result of the death of CPL Bogar, each member of the Bogar Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Bogar's society, companionship, and counsel.

The James Michael Boucher Jr. Family

298. Plaintiff Corporal James Michael Boucher Jr. served in Afghanistan as a member of the U.S. Marine Corps. On June 12, 2011, Cpl Boucher was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded Cpl Boucher, who lost both of his legs above the knee and suffered from serious injuries to his left-hand and left buttocks. The attack constituted an extrajudicial killing. As a result of the June 12, 2011 attack and his injuries, Cpl Boucher has experienced severe physical and emotional pain and suffering.

299. Cpl Boucher was a national of the United States at the time of the attack, and remains one to this day.

300. Plaintiff James Boucher Sr. is the father of Cpl Boucher. He is a national of the United States.

301. Plaintiff Kimberley Boucher is the mother of Cpl Boucher. She is a national of the United States.

302. Plaintiff Britany Boucher is the sister of Cpl Boucher. She is a national of the United States.

303. As a result of the June 12, 2011 attack and Cpl Boucher's injuries, each member of the Boucher Family has experienced severe mental anguish, emotional pain and suffering.

The Francisco J. Briseño-Alvarez Jr. Family

304. Specialist Francisco J. Briseño-Alvarez Jr. served in Afghanistan as a member of the U.S. Army National Guard. On September 25, 2011, SPC Briseño-Alvarez was injured in an IED attack committed by the Taliban in Laghman Province, Afghanistan. SPC Briseño-Alvarez died on September 25, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

305. SPC Briseño-Alvarez was a member of the armed forces at the time of the attack and his death.

306. Plaintiff Luis Briseño is the brother of SPC Briseño-Alvarez. He is a national of the United States.

307. As a result of the death of SPC Briseño-Alvarez, each member of the Briseño-Alvarez Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Briseño-Alvarez's society, companionship, and counsel.

The David L. Brodeur Family

308. Major David L. Brodeur served in Afghanistan as a member of the U.S. Air Force. On April 27, 2011, Maj Brodeur was injured in an insider attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Maj Brodeur died on April 27, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

309. Maj Brodeur was a national of the United States at the time of the attack and his death.

310. Plaintiff Susan Brodeur is the widow of Maj Brodeur. She is a national of the United States.

311. Plaintiff D.L.B., by and through his next friend Susan Brodeur, is the minor son of Maj Brodeur. He is a national of the United States.

312. Plaintiff E.L.B., by and through her next friend Susan Brodeur, is the minor daughter of Maj Brodeur. She is a national of the United States.

313. Plaintiff Joyce A. Brodeur is the mother of Maj Brodeur. She is a national of the United States.

314. Plaintiff Lawrence A. Brodeur is the father of Maj Brodeur. He is a national of the United States.

315. As a result of the death of Maj Brodeur, each member of the Brodeur Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Maj Brodeur's society, companionship, and counsel.

The Jonathan P. Brostrom Family

316. First Lieutenant Jonathan P. Brostrom served in Afghanistan as a member of the U.S. Army. On July 13, 2008, 1LT Brostrom was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Taliban and al-Qaeda, a designated FTO at the time of the attack, in Nuristan Province, Afghanistan. 1LT Brostrom died on July 13, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

317. 1LT Brostrom was a national of the United States at the time of the attack and his death.

318. Plaintiff David Brostrom is the father of 1LT Brostrom. He is a national of the United States.

319. Plaintiff Mary Jo Brostrom is the mother of 1LT Brostrom. She is a national of the United States.

320. Plaintiff Blake D. Brostrom is the brother of 1LT Brostrom. He is a national of the United States.

321. As a result of the death of 1LT Brostrom, each member of the Brostrom Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1LT Brostrom's society, companionship, and counsel.

The Harold Brown Jr. Family

322. Harold Brown Jr. served in Afghanistan as a U.S. government employee serving in the Central Intelligence Agency. On December 30, 2009, Mr. Brown was injured in a suicide bombing attack conducted on Camp Chapman, in Khost Province, Afghanistan ("Camp Chapman Attack"). Mr. Brown died on December 30, 2009 as a result of injuries sustained during the Camp Chapman Attack. The attack constituted an extrajudicial killing.

323. The Camp Chapman Attack was planned and authorized by al-Qaeda, and jointly committed by al-Qaeda, the Pakistani Taliban, and the Haqqani Network, a part of the Taliban. For its part, the Haqqani Network provided substantial assistance to its al-Qaeda and Pakistani Taliban terrorist partners in the Camp Chapman Attack, including the al-Qaeda suicide bomber who triggered the suicide vest. On information and belief, the Haqqani Network provided key support for the Camp Chapman Attack, including but not limited to, intelligence and logistical support. The Taliban has publicly taken responsibility for the attack.

324. Mr. Brown was a national of the United States at the time of the attack and his death.

325. Plaintiff Barbara Brown is the mother of Mr. Brown. She is a national of the United States.

326. Plaintiff Harold Brown Sr. is the father of Mr. Brown. He is a national of the United States.

327. Plaintiff Regina Brown is the sister of Mr. Brown. She is a national of the United States.

328. Plaintiff Paula Rich is the sister of Mr. Brown. She is a national of the United States.

329. As a result of the death of Mr. Brown, each member of the Brown Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Brown's society, companionship, and counsel.

The Scott W. Brunkhorst Family

330. Staff Sergeant Scott W. Brunkhorst served in Afghanistan as a member of the U.S. Army. On March 30, 2010, SSG Brunkhorst was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SSG Brunkhorst died on March 30, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

331. SSG Brunkhorst was a national of the United States at the time of the attack and his death.

332. Plaintiff Richard G. Brunkhorst is the father of SSG Brunkhorst. He is a national of the United States.

333. As a result of the death of SSG Brunkhorst, each member of the Brunkhorst Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Brunkhorst's society, companionship, and counsel.

The Nicholas B. Burley Family

334. Specialist Nicholas B. Burley served in Afghanistan as a member of the U.S. Army. On July 30, 2013, SPC Burley was injured in an indirect fire attack committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Logar Province, Afghanistan. SPC Burley died on July 30, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

335. SPC Burley was a national of the United States at the time of the attack and his death.

336. Plaintiff William Michael Burley is the father of SPC Burley. He is a national of the United States.

337. Plaintiff Tammy Olmstead is the mother of SPC Burley. She is a national of the United States.

338. Plaintiff Michael Collins is the brother of SPC Burley. He is a national of the United States.

339. Plaintiff Dan Olmstead is the step-father of SPC Burley. He is a national of the United States. Dan Olmstead lived in the same household as SPC Burley for a substantial period of time and considered SPC Burley the functional equivalent of a biological son.

340. As a result of the death of SPC Burley, each member of the Burley Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Burley's society, companionship, and counsel.

The Norman L. Cain III Family

341. Specialist Norman L. Cain III served in Afghanistan as a member of the U.S. Army National Guard. On March 15, 2009, SPC Cain was injured in an IED attack committed

by the Taliban in Helmand Province, Afghanistan. SPC Cain died on March 15, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

342. SPC Cain was a national of the United States at the time of the attack and his death.

343. Plaintiff Brigitte Peterson is the widow of SPC Cain. She is a national of the United States.

344. Plaintiff T.C., by and through his next friend Brigitte Peterson, is the minor son of SPC Cain. He is a national of the United States.

345. Plaintiff Andrew Bower is the brother of SPC Cain. He is a national of the United States.

346. Plaintiff F.S., by and through her next friend Brigitte Peterson, is the minor step-daughter of SPC Cain. She is a national of the United States. F.S. lived in the same household as SPC Cain for a substantial period of time and considered SPC Cain the functional equivalent of a biological father.

347. As a result of the death of SPC Cain, each member of the Cain Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Cain's society, companionship, and counsel.

The Joshua R. Campbell Family

348. Specialist Joshua R. Campbell served in Afghanistan as a member of the U.S. Army. On January 29, 2011, SPC Campbell was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SPC Campbell died on January 29, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

349. SPC Campbell was a national of the United States at the time of the attack and his death.

350. Plaintiff James Reginald Campbell is the father of SPC Campbell. He is a national of the United States.

351. As a result of the death of SPC Campbell, each member of the Campbell Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Campbell's society, companionship, and counsel.

The Kevin Cardoza Family

352. Specialist Kevin Cardoza served in Afghanistan as a member of the U.S. Army. On May 4, 2013, SPC Cardoza was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Cardoza died on May 4, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

353. SPC Cardoza was a national of the United States at the time of the attack and his death.

354. Plaintiff Maria Cardoza is the mother of SPC Cardoza. She is a national of the United States.

355. Plaintiff Ramiro Cardoza Sr. is the father of SPC Cardoza. He is a national of the United States.

356. Plaintiff Ramiro Cardoza Jr. is the brother of SPC Cardoza. He is a national of the United States.

357. As a result of the death of SPC Cardoza, each member of the Cardoza Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Cardoza's society, companionship, and counsel.

The Joseph T. Caron Family

358. Specialist Joseph T. Caron served in Afghanistan as a member of the U.S. Army. On April 11, 2010, SPC Caron was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SPC Caron died on April 11, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

359. SPC Caron was a national of the United States at the time of the attack and his death.

360. Plaintiff Jeff Caron is the father of SPC Caron. He is a national of the United States.

361. Plaintiff Cassandra Caron is the sister of SPC Caron. She is a national of the United States.

362. Plaintiff Karen Caron is the step-mother of SPC Caron. She is a national of the United States. Karen Caron lived in the same household as SPC Caron for a substantial period of time and considered SPC Caron the functional equivalent of a biological son.

363. As a result of the death of SPC Caron, each member of the Caron Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Caron's society, companionship, and counsel.

The Patrick R. Carroll Family

364. Sergeant Patrick R. Carroll served in Afghanistan as a member of the U.S. Army. On February 7, 2011, SGT Carroll was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SGT Carroll died on February 7, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

365. SGT Carroll was a national of the United States at the time of the attack and his death.

366. Plaintiff Sumer J. Roberts is the sister of SGT Carroll. She is a national of the United States.

367. As a result of the death of SGT Carroll, each member of the Carroll Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Carroll's society, companionship, and counsel.

The George W. Cauley Family

368. Specialist George W. Cauley served in Afghanistan as a member of the U.S. Army National Guard. On October 7, 2009, SPC Cauley was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SPC Cauley died on October 10, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

369. SPC Cauley was a national of the United States at the time of the attack and his death.

370. Plaintiff Richard Allen Cauley is the father of SPC Cauley. He is a national of the United States.

371. As a result of the death of SPC Cauley, each member of the Cauley Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Cauley's society, companionship, and counsel.

The Rick J. Centanni Family

372. Lance Corporal Rick J. Centanni served in Afghanistan as a member of the U.S. Marine Corps. On March 24, 2010, LCpl Centanni was injured in an IED attack committed by

the Taliban in Helmand Province, Afghanistan. LCpl Centanni died on March 24, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

373. LCpl Centanni was a national of the United States at the time of the attack and his death.

374. Plaintiff Jon Centanni is the father of LCpl Centanni. He is a national of the United States.

375. As a result of the death of LCpl Centanni, each member of the Centanni Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Centanni's society, companionship, and counsel.

The Benjamin G. Chisholm Family

376. Private First Class Benjamin G. Chisholm served in Afghanistan as a member of the U.S. Army. On August 17, 2010, PFC Chisholm was injured in an IED attack committed by the Taliban in Kunar Province, Afghanistan. PFC Chisholm died on August 17, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

377. PFC Chisholm was a national of the United States at the time of the attack and his death.

378. Plaintiff Glenn Chisholm is the father of PFC Chisholm. He is a national of the United States.

379. Plaintiff Karma Chisholm is the step-mother of PFC Chisholm. She is a national of the United States. Karma Chisholm lived in the same household as PFC Chisholm for a substantial period of time and considered PFC Chisholm the functional equivalent of a biological son.

380. As a result of the death of PFC Chisholm, each member of the Chisholm Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Chisholm's society, companionship, and counsel.

The Rusty H. Christian Family

381. Staff Sergeant Rusty H. Christian served in Afghanistan as a member of the U.S. Army. On January 28, 2010, SSG Christian was injured in an IED attack committed by the Taliban in Uruzgan Province, Afghanistan. SSG Christian died on January 28, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

382. SSG Christian was a national of the United States at the time of the attack and his death.

383. Plaintiff Donna Ball is the mother of SSG Christian. She is a national of the United States.

384. Plaintiff Michael Christian is the father of SSG Christian. He is a national of the United States.

385. Plaintiff Michael Aaron Christian is the brother of SSG Christian. He is a national of the United States.

386. As a result of the death of SSG Christian, each member of the Christian Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Christian's society, companionship, and counsel.

The Chazray C. Clark Family

387. Specialist Chazray C. Clark served in Afghanistan as a member of the U.S. Army. On September 18, 2011, SPC Clark was injured in an IED attack committed by the Taliban in

Kandahar Province, Afghanistan. SPC Clark died on September 18, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

388. SPC Clark was a national of the United States at the time of the attack and his death.

389. Plaintiff Keyko D. Clark is the mother of SPC Clark. She is a national of the United States.

390. Plaintiff Corteize Clark is the brother of SPC Clark. He is a national of the United States.

391. Plaintiff Precious Clark is the sister of SPC Clark. She is a national of the United States.

392. Plaintiff Cleveland Davis is the brother of SPC Clark. He is a national of the United States.

393. As a result of the death of SPC Clark, each member of the Clark Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Clark's society, companionship, and counsel.

Jonathan Cleary

394. Plaintiff Corporal Jonathan Cleary served in Afghanistan as a member of the U.S. Army. On May 6, 2012, CPL Cleary was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktia Province, Afghanistan. The attack severely wounded CPL Cleary, who lost his right leg below the knee. The attack constituted an extrajudicial killing. As a result of the May 6, 2012 attack and his injuries, CPL Cleary has experienced severe physical and emotional pain and suffering.

395. CPL Cleary was a national of the United States at the time of the attack and remains one to this day.

The Timothy J. Conrad Jr. Family

396. Sergeant Timothy J. Conrad Jr. served in Afghanistan as a member of the U.S. Army. On February 23, 2012, SGT Conrad was injured in an insider attack committed by the Taliban in Nangarhar Province, Afghanistan. SGT Conrad died on February 23, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

397. SGT Conrad was a national of the United States at the time of the attack and his death.

398. Plaintiff Holly Conrad is the widow of SGT Conrad. She is a national of the United States.

399. Plaintiff B.C., by and through his next friend Holly Conrad, is the minor son of SGT Conrad. He is a national of the United States.

400. As a result of the death of SGT Conrad, each member of the Conrad Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Conrad's society, companionship, and counsel.

The Robert J. Cottle Family

401. Sergeant Major Robert J. Cottle served in Afghanistan as a member of the U.S. Marine Corps Reserves. On March 24, 2010, SgtMa Cottle was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SgtMa Cottle died on March 24, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

402. SgtMa Cottle was a national of the United States at the time of the attack and his death.

403. Plaintiff Kenneth Cottle is the father of SgtMa Cottle. He is a national of the United States.

404. As a result of the death of SgtMa Cottle, each member of the Cottle Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SgtMa Cottle's society, companionship, and counsel.

The Daniel L. Cox Family

405. Corporal Daniel L. Cox served in Afghanistan as a member of the U.S. Army. On September 12, 2009, CPL Cox was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. CPL Cox died on September 12, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

406. CPL Cox was a national of the United States at the time of the attack and his death.

407. Plaintiff Kim B. Cox is the father of CPL Cox. He is a national of the United States.

408. Plaintiff Sharon J. Cox is the mother of CPL Cox. She is a national of the United States.

409. Plaintiff Shannon Butler is the sister of CPL Cox. She is a national of the United States.

410. As a result of the death of CPL Cox, each member of the Cox Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Cox's society, companionship, and counsel.

The Nathan M. Cox Family

411. Staff Sergeant Nathan M. Cox served in Afghanistan as a member of the U.S. Army. On September 20, 2008, SSG Cox was injured in an IED attack committed by the Taliban in Kunar Province, Afghanistan. SSG Cox died on September 20, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

412. SSG Cox was a national of the United States at the time of the attack and his death.

413. Plaintiff Hannah Cox is the sister of SSG Cox. She is a national of the United States.

414. As a result of the death of SSG Cox, each member of the Cox Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Cox's society, companionship, and counsel.

The Ross Cox Family

415. Plaintiff Staff Sergeant Ross Cox served in Afghanistan as a member of the U.S. Army. On November 15, 2011, SSG Cox was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. The attack severely wounded SSG Cox, who lost his left leg and suffered from a serious right leg injury, left arm nerve damage, and hearing loss. The attack constituted an extrajudicial killing. As a result of the November 15, 2011 attack and his injuries, SSG Cox has experienced severe physical and emotional pain and suffering.

416. SSG Cox was a national of the United States at the time of the attack, and remains one to this day.

417. Plaintiff Nicole Cox is the wife of SSG Cox. She is a national of the United States.

418. Plaintiff A.C., by and through his next friend Ross Cox, is the minor son of SSG Cox. He is a national of the United States.

419. Plaintiff B.C., by and through his next friend Ross Cox, is the minor son of SSG Cox. He is a national of the United States.

420. Plaintiff H.C., by and through her next friend Ross Cox, is the minor daughter of SSG Cox. She is a national of the United States.

421. Plaintiff Peyton Cooney is the daughter of SSG Cox. She is a national of the United States.

422. As a result of the November 15, 2011 attack and SSG Cox's injuries, each member of the Cox Family has experienced severe mental anguish, emotional pain and suffering.

The Robert W. Crow Family

423. Specialist Robert W. Crow served in Afghanistan as a member of the U.S. Army National Guard. On July 10, 2010, SPC Crow was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SPC Crow died on July 10, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

424. SPC Crow was a national of the United States at the time of the attack and his death.

425. Plaintiff David Aaron Crow is the son of SPC Crow. He is a national of the United States.

426. As a result of the death of SPC Crow, each member of the Crow Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Crow's society, companionship, and counsel.

The Justin E. Culbreth Family

427. Specialist Justin E. Culbreth served in Afghanistan as a member of the U.S. Army. On November 17, 2010, SPC Culbreth was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Culbreth died on November 17, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

428. SPC Culbreth was a national of the United States at the time of the attack and his death.

429. Plaintiff Cheryl A. Culbreth is the mother of SPC Culbreth. She is a national of the United States.

430. Plaintiff Walter L. Culbreth is the father of SPC Culbreth. He is a national of the United States.

431. As a result of the death of SPC Culbreth, each member of the Culbreth Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Culbreth's society, companionship, and counsel.

The Joshua J. Cullins Family

432. Staff Sergeant Joshua J. Cullins served in Afghanistan as a member of the U.S. Marine Corps. On October 19, 2010, SSgt Cullins was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSgt Cullins died on October 19, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

433. SSgt Cullins was a national of the United States at the time of the attack and his death.

434. Plaintiff James Farris Cullins Jr. is the father of SSgt Cullins. He is a national of the United States.

435. Plaintiff Cooper Henry Pike Cullins is the brother of SSgt Cullins. He is a national of the United States.

436. Plaintiff Donavan Kurt Schilling Cullins is the brother of SSgt Cullins. He is a national of the United States.

437. Plaintiff Barbara Schilling is the step-mother of SSgt Cullins. She is a national of the United States. Barbara Schilling lived in the same household as SSgt Cullins for a substantial period of time and considered SSgt Cullins the functional equivalent of a biological son.

438. As a result of the death of SSgt Cullins, each member of the Cullins Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Cullins's society, companionship, and counsel.

The Michael A. Dahl Jr. Family

439. Specialist Michael A. Dahl Jr. served in Afghanistan as a member of the U.S. Army. On October 17, 2009, SPC Dahl was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Dahl died on October 17, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

440. SPC Dahl was a national of the United States at the time of the attack and his death.

441. Plaintiff Patricia Dahl is the mother of SPC Dahl. She is a national of the United States.

442. Plaintiff Angel Dahl is the brother of SPC Dahl. He is a national of the United States.

443. As a result of the death of SPC Dahl, each member of the Dahl Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Dahl's society, companionship, and counsel.

The Marcus Dandrea Family

444. Plaintiff Sergeant Marcus Dandrea served in Afghanistan as a member of the U.S. Marine Corps. On February 24, 2011, Sgt Dandrea was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded Sgt Dandrea, who lost both legs above the knee and suffered from injuries to his right hand and arm and a traumatic brain injury. The attack constituted an extrajudicial killing. As a result of the February 24, 2011 attack and his injuries, Sgt Dandrea has experienced severe physical and emotional pain and suffering.

445. Sgt Dandrea was a national of the United States at the time of the attack, and remains one to this day.

446. Plaintiff N.D., by and through her next friend Marcus Dandrea, is the minor daughter of Sgt Dandrea. She is a national of the United States.

447. Plaintiff Leanora Dandrea is the mother of Sgt Dandrea. She is a national of the United States.

448. Plaintiff Mark William Dandrea is the father of Sgt Dandrea. He is a national of the United States.

449. Plaintiff H.D., by and through her next friend Leanora Dandrea, is the minor sister of Sgt Dandrea. She is a national of the United States.

450. Plaintiff I.D., by and through his next friend Leanora Dandrea, is the minor brother of Sgt Dandrea. He is a national of the United States.

451. Plaintiff Benjamin Dandrea is the brother of Sgt Dandrea. He is a national of the United States.

452. Plaintiff Gabriel Dandrea is the brother of Sgt Dandrea. He is a national of the United States.

453. Plaintiff Hannah Dandrea is the sister of Sgt Dandrea. She is a national of the United States.

454. Plaintiff Joshua Dandrea is the brother of Sgt Dandrea. He is a national of the United States.

455. Plaintiff Samuel Dandrea is the brother of Sgt Dandrea. He is a national of the United States.

456. As a result of the February 24, 2011 attack and Sgt Dandrea's injuries, each member of the Dandrea Family has experienced severe mental anguish, emotional pain and suffering.

The Devin J. Daniels Family

457. Sergeant Devin J. Daniels served in Afghanistan as a member of the U.S. Army. On August 25, 2011, SGT Daniels was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SGT Daniels died on August 25, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

458. SGT Daniels was a national of the United States at the time of the attack and his death.

459. Plaintiff James L. Daniels is the father of SGT Daniels. He is a national of the United States.

460. Plaintiff Lucas Daniels is the brother of SGT Daniels. He is a national of the United States.

461. Plaintiff Sophie Daniels is the sister of SGT Daniels. She is a national of the United States.

462. As a result of the death of SGT Daniels, each member of the Daniels Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Daniels's society, companionship, and counsel.

The Adam J. Davis Family

463. Specialist Adam J. Davis served in Afghanistan as a member of the U.S. Army. On July 23, 2007, SPC Davis was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SPC Davis died on July 23, 2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

464. SPC Davis was a national of the United States at the time of the attack and his death.

465. Plaintiff Tracy Lee Carrico is the mother of SPC Davis. She is a national of the United States.

466. Plaintiff Timothy Davis is the father of SPC Davis. He is a national of the United States.

467. As a result of the death of SPC Davis, each member of the Davis Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Davis's society, companionship, and counsel.

The Jonathan D. Davis Family

468. Staff Sergeant Jonathan D. Davis served in Afghanistan as a member of the U.S. Marine Corps. On February 22, 2013, SSgt Davis was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSgt Davis died on February 22, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

469. SSgt Davis was a national of the United States at the time of the attack and his death.

470. Plaintiff Helena Davis is the widow of SSgt Davis. She is a national of the United States.

471. Plaintiff C.D., by and through his next friend Helena Davis, is the minor son of SSgt Davis. He is a national of the United States.

472. As a result of the death of SSgt Davis, each member of the Davis Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Davis's society, companionship, and counsel.

The Ezra Dawson Family

473. Sergeant Ezra Dawson served in Afghanistan as a member of the U.S. Army. On January 17, 2009, SGT Dawson was injured in an attack on a helicopter committed by the Taliban in Kunar Province, Afghanistan. SGT Dawson died on January 17, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

474. SGT Dawson was a national of the United States at the time of the attack and his death.

475. Plaintiff Eva Farr-Wallace is the mother of SGT Dawson. She is a national of the United States.

476. Plaintiff Calvin D. Jamison is the father of SGT Dawson. He is a national of the United States.

477. Plaintiff Atarah Wright is the sister of SGT Dawson. She is a national of the United States.

478. As a result of the death of SGT Dawson, each member of the Dawson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Dawson's society, companionship, and counsel.

The David P. Day Family

479. Staff Sergeant David P. Day served in Afghanistan as a member of the U.S. Marine Corps. On April 24, 2011, SSgt Day was injured in an IED attack committed by the Taliban in Badghis Province, Afghanistan. SSgt Day died on April 24, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

480. SSgt Day was a national of the United States at the time of the attack and his death.

481. Plaintiff Don Day is the father of SSgt Day. He is a national of the United States.

482. Plaintiff Kathy Day is the mother of SSgt Day. She is a national of the United States.

483. As a result of the death of SSgt Day, each member of the Day Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Day's society, companionship, and counsel.

The Fernando De La Rosa Family

484. Sergeant Fernando De La Rosa served in Afghanistan as a member of the U.S. Army. On October 27, 2009, SGT De La Rosa was injured in an IED attack committed by the

Taliban in Kandahar Province, Afghanistan. SGT De La Rosa died on October 27, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

485. SGT De La Rosa was a national of the United States at the time of the attack and his death.

486. Plaintiff Rolando De La Rosa is the father of SGT De La Rosa. He is a national of the United States.

487. As a result of the death of SGT De La Rosa, each member of the De La Rosa Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT De La Rosa's society, companionship, and counsel.

The Jeffrey F. DePrimo Family

488. First Lieutenant Jeffrey F. DePrimo served in Afghanistan as a member of the U.S. Army National Guard. On May 20, 2008, 1LT DePrimo was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Ghazni Province, Afghanistan. 1LT DePrimo died on May 20, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

489. 1LT DePrimo was a national of the United States at the time of the attack and his death.

490. Plaintiff Helen DePrimo is the mother of 1LT DePrimo. She is a national of the United States.

491. Plaintiff Joseph DePrimo is the father of 1LT DePrimo. He is a national of the United States.

492. Plaintiff Jodi Calabro is the sister of 1LT DePrimo. She is a national of the United States.

493. Plaintiff Danielle Fediw is the sister of 1LT DePrimo. She is a national of the United States.

494. As a result of the death of 1LT DePrimo, each member of the DePrimo Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1LT DePrimo's society, companionship, and counsel.

The Matthew J. DeYoung Family

495. Sergeant Matthew J. DeYoung served in Afghanistan as a member of the U.S. Marine Corps. On February 18, 2011, Sgt DeYoung was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Sgt DeYoung died on February 18, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

496. Sgt DeYoung was a national of the United States at the time of the attack and her death.

497. Plaintiff Teddi DeYoung is the mother of Sgt DeYoung. She is a national of the United States.

498. As a result of the death of Sgt DeYoung, each member of the DeYoung Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Sgt DeYoung's society, companionship, and counsel.

The Ara T. Deysie Family

499. Private First Class Ara T. Deysie served in Afghanistan as a member of the U.S. Army. On May 9, 2008, PFC Deysie was injured in a rocket propelled grenade attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. PFC Deysie died on May 9, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

500. PFC Deysie was a national of the United States at the time of the attack and his death.

501. Plaintiff Lori Deysie is the mother of PFC Deysie. She is a national of the United States.

502. Plaintiff Erisa Deysie is the sister of PFC Deysie. She is a national of the United States.

503. Plaintiff Sidnee Deysie is the sister of PFC Deysie. She is a national of the United States.

504. As a result of the death of PFC Deysie, each member of the Deysie Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Deysie's society, companionship, and counsel.

The John P. Dion Family

505. Private First Class John P. Dion served in Afghanistan as a member of the U.S. Army. On January 3, 2010, PFC Dion was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. PFC Dion died on January 3, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

506. PFC Dion was a national of the United States at the time of the attack and his death.

507. Plaintiff Patricia Elsner is the mother of PFC Dion. She is a national of the United States.

508. Plaintiff Kelsey Thomas is the sister of PFC Dion. She is a national of the United States.

509. Plaintiff Mark Elsner is the step-father of PFC Dion. He is a national of the United States. Mark Elsner lived in the same household as PFC Dion for a substantial period of time and considered PFC Dion the functional equivalent of a biological son.

510. Plaintiff Jackie Allen is the step-sister of PFC Dion. She is a national of the United States. Jackie Allen lived in the same household as PFC Dion for a substantial period of time and considered PFC Dion the functional equivalent of a biological brother.

511. Plaintiff Mark Anthony Elsner is the step-brother of PFC Dion. He is a national of the United States. Mark Anthony Elsner lived in the same household as PFC Dion for a substantial period of time and considered PFC Dion the functional equivalent of a biological brother.

512. As a result of the death of PFC Dion, each member of the Dion Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Dion's society, companionship, and counsel.

The Corey J. Dodge Family

513. Corey J. Dodge served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On August 22, 2015, Mr. Dodge was injured in a suicide bombing attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Mr. Dodge died on August 22, 2015 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

514. Mr. Dodge was a national of the United States at the time of the attack and his death.

515. Plaintiff Kelli Dodge is the widow of Mr. Dodge. She is a national of the United States.

516. Plaintiff B.C.D., by and through his next friend Kelli Dodge, is the minor son of Mr. Dodge. He is a national of the United States.

517. Plaintiff P.A.D., by and through her next friend Kelli Dodge, is the minor daughter of Mr. Dodge. She is a national of the United States.

518. As a result of the death of Mr. Dodge, each member of the Dodge Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Dodge's society, companionship, and counsel.

The Max W. Donahue Family

519. Corporal Max W. Donahue served in Afghanistan as a member of the U.S. Marine Corps. On August 4, 2010, Cpl Donahue was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Cpl Donahue died on August 7, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

520. Cpl Donahue was a national of the United States at the time of the attack and his death.

521. Plaintiff Julie Schrock is the mother of Cpl Donahue. She is a national of the United States.

522. Plaintiff Ryan Donahue is the brother of Cpl Donahue. He is a national of the United States.

523. Plaintiff Chandler Schrock is the step-father of Cpl Donahue. He is a national of the United States. Chandler Schrock lived in the same household as Cpl Donahue for a substantial period of time and considered Cpl Donahue the functional equivalent of a biological son.

524. Plaintiff Taylor Schrock is the step-brother of Cpl Donahue. He is a national of the United States. Taylor Schrock lived in the same household as Cpl Donahue for a substantial period of time and considered Cpl Donahue the functional equivalent of a biological brother.

525. As a result of the death of Cpl Donahue, each member of the Donahue Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Cpl Donahue's society, companionship, and counsel.

The Stephen J. Dunning Family

526. Staff Sergeant Stephen J. Dunning served in Afghanistan as a member of the U.S. Marine Corps. On October 27, 2011, SSgt Dunning was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSgt Dunning died on October 27, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

527. SSgt Dunning was a national of the United States at the time of the attack and his death.

528. Plaintiff Robert L. Dunning is the father of SSgt Dunning. He is a national of the United States.

529. Plaintiff Tomoe Dunning is the mother of SSgt Dunning. She is a national of the United States.

530. Plaintiff Joy Coy is the sister of SSgt Dunning. She is a national of the United States.

531. As a result of the death of SSgt Dunning, each member of the Dunning Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Dunning's society, companionship, and counsel.

The Kevin A. Dupont Family

532. Sergeant First Class Kevin A. Dupont served in Afghanistan as a member of the U.S. Army. On March 8, 2009, SFC Dupont was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SFC Dupont died on June 17, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

533. SFC Dupont was a national of the United States at the time of the attack and his death.

534. Plaintiff Lisa Murawski-Dupont is the widow of SFC Dupont. She is a national of the United States.

535. Plaintiff Mark P. Dupont is the brother of SFC Dupont. He is a national of the United States.

536. As a result of the death of SFC Dupont, each member of the Dupont Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Dupont's society, companionship, and counsel.

Erich Ellis

537. Plaintiff Sergeant Erich Ellis served in Afghanistan as a member of the U.S. Marine Corps. On June 12, 2019, Sgt Ellis was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded Sgt Ellis, who lost his right leg and suffered from extensive, permanent damage to his left leg, right arm, and upper right leg as well as a traumatic brain injury. The attack constituted an extrajudicial killing. As a result of the June 12, 2019 attack and his injuries, Sgt Ellis has experienced severe physical and emotional pain and suffering.

538. Sgt Ellis was a national of the United States at the time of the attack and remains one to this day.

The Kenneth B. Elwell Family

539. Sergeant First Class Kenneth B. Elwell served in Afghanistan as a member of the U.S. Army. On July 17, 2011, SFC Elwell was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SFC Elwell died on July 17, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

540. SFC Elwell was a national of the United States at the time of the attack and his death.

541. Plaintiff Kristen A. Elwell is the widow of SFC Elwell. She is a national of the United States.

542. Plaintiff E.M.E., by and through her next friend Kristen A. Elwell, is the minor daughter of SFC Elwell. She is a national of the United States.

543. Plaintiff N.B.E., by and through his next friend Kristen A. Elwell, is the minor son of SFC Elwell. He is a national of the United States.

544. Plaintiff Susan Burkhard is the sister of SFC Elwell. She is a national of the United States.

545. As a result of the death of SFC Elwell, each member of the Elwell Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Elwell's society, companionship, and counsel.

The Richard A. Essex Family

546. Sergeant Richard A. Essex served in Afghanistan as a member of the U.S. Army. On August 16, 2012, SGT Essex was injured in an attack on a Chinook helicopter committed by

the Taliban in Kandahar Province, Afghanistan. SGT Essex died on August 16, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

547. SGT Essex was a national of the United States at the time of the attack and his death.

548. Plaintiff Charles Essex is the father of SGT Essex. He is a national of the United States.

549. As a result of the death of SGT Essex, each member of the Essex Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Essex's society, companionship, and counsel.

The Jered W. Ewy Family

550. Second Lieutenant Jered W. Ewy served in Afghanistan as a member of the U.S. Army National Guard. On July 29, 2011, 2LT Ewy was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktia Province, Afghanistan. 2LT Ewy died on July 29, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

551. 2LT Ewy was a national of the United States at the time of the attack and his death.

552. Plaintiff John Ewy is the father of 2LT Ewy. He is a national of the United States.

553. As a result of the death of 2LT Ewy, each member of the Ewy Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 2LT Ewy's society, companionship, and counsel.

The Garrett A. Fant Family

554. Specialist Garrett A. Fant served in Afghanistan as a member of the U.S. Army. On September 26, 2011, SPC Fant was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SPC Fant died on September 26, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

555. SPC Fant was a national of the United States at the time of the attack and his death.

556. Plaintiff John L. Fant is the father of SPC Fant. He is a national of the United States.

557. As a result of the death of SPC Fant, each member of the Fant Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Fant's society, companionship, and counsel.

The Jason D. Fingar Family

558. Specialist Jason D. Fingar served in Afghanistan as a member of the U.S. Army. On May 22, 2010, SPC Fingar was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SPC Fingar died on May 22, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

559. SPC Fingar was a national of the United States at the time of the attack and his death.

560. Plaintiff David Fingar is the father of SPC Fingar. He is a national of the United States.

561. Plaintiff Rhonda G. Fingar is the mother of SPC Fingar. She is a national of the United States.

562. Plaintiff Andrea Dietz is the sister of SPC Fingar. She is a national of the United States.

563. Plaintiff Buford Jeremiah Fingar is the brother of SPC Fingar. He is a national of the United States.

564. Plaintiff Donald Joshua Fingar is the brother of SPC Fingar. He is a national of the United States.

565. As a result of the death of SPC Fingar, each member of the Fingar Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Fingar's society, companionship, and counsel.

The James M. Finley Family

566. Specialist James M. Finley served in Afghanistan as a member of the U.S. Army. On May 31, 2008, SPC Finley was injured in an IED attack committed by the Taliban in Nangarhar Province, Afghanistan. SPC Finley died on May 31, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

567. SPC Finley was a national of the United States at the time of the attack and his death.

568. Plaintiff Gerald W. Finley is the father of SPC Finley. He is a national of the United States.

569. Plaintiff John M. Finley is the brother of SPC Finley. He is a national of the United States.

570. Plaintiff Joshua M. Finley is the brother of SPC Finley. He is a national of the United States.

571. Plaintiff Jennifer M. Lefors is the sister of SPC Finley. She is a national of the United States.

572. As a result of the death of SPC Finley, each member of the Finley Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Finley's society, companionship, and counsel.

The Michael L. Freeman Jr. Family

573. Lance Corporal Michael L. Freeman Jr. served in Afghanistan as a member of the U.S. Marine Corps. On February 1, 2010, LCpl Freeman was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Freeman died on February 1, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

574. LCpl Freeman was a national of the United States at the time of the attack and his death.

575. Plaintiff Stephanie Freeman is the widow of LCpl Freeman. She is a national of the United States.

576. As a result of the death of LCpl Freeman, each member of the Freeman Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Freeman's society, companionship, and counsel.

The Ronald D. Freeman Family

577. Lance Corporal Ronald D. Freeman served in Afghanistan as a member of the U.S. Marine Corps. On April 28, 2011, LCpl Freeman was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Freeman died on April 28, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

578. LCpl Freeman was a national of the United States at the time of the attack and his death.

579. Plaintiff Katie C. Freeman is the widow of LCpl Freeman. She is a national of the United States.

580. Plaintiff K.M.F., by and through her next friend Katie C. Freeman, is the minor daughter of LCpl Freeman. She is a national of the United States.

581. Plaintiff W.D.F., by and through his next friend Katie C. Freeman, is the minor son of LCpl Freeman. He is a national of the United States.

582. As a result of the death of LCpl Freeman, each member of the Freeman Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Freeman's society, companionship, and counsel.

The Joseph M. Garrison Family

583. Sergeant Joseph M. Garrison served in Afghanistan as a member of the U.S. Marine Corps. On June 6, 2011, Sgt Garrison was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Sgt Garrison died on June 6, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

584. Sgt Garrison was a national of the United States at the time of the attack and his death.

585. Plaintiff Joseph D. Garrison is the father of Sgt Garrison. He is a national of the United States.

586. As a result of the death of Sgt Garrison, each member of the Garrison Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Sgt Garrison's society, companionship, and counsel.

The William Joseph Gilbert Family

587. Specialist William Joseph Gilbert served in Afghanistan as a member of the U.S. Army. On May 14, 2013, SPC Gilbert was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Gilbert died on May 14, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

588. SPC Gilbert was a national of the United States at the time of the attack and his death.

589. Plaintiff Joanna Gilbert is the mother of SPC Gilbert. She is a national of the United States.

590. As a result of the death of SPC Gilbert, each member of the Gilbert Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Gilbert's society, companionship, and counsel.

The Paul Goins Jr. Family

591. Paul Goins Jr. served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On February 10, 2014, Mr. Goins was injured in an IED attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Mr. Goins died on February 10, 2014 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

592. Mr. Goins was a national of the United States at the time of the attack and his death.

593. Plaintiff Patricia Goins is the widow of Mr. Goins. She is a national of the United States.

594. Plaintiff Paul Edward Goins III is the son of Mr. Goins. He is a national of the United States.

595. Plaintiff Emmitt Dwayne Burns is the step-son of Mr. Goins. He is a national of the United States. Emmitt Dwayne Burns lived in the same household as Mr. Goins for a substantial period of time and considered Mr. Goins the functional equivalent of a biological father.

596. Plaintiff Janice Caruso is the step-daughter of Mr. Goins. She is a national of the United States. Janice Caruso lived in the same household as Mr. Goins for a substantial period of time and considered Mr. Goins the functional equivalent of a biological father.

597. Plaintiff Dana Rainey is the step-daughter of Mr. Goins. She is a national of the United States. Dana Rainey lived in the same household as Mr. Goins for a substantial period of time and considered Mr. Goins the functional equivalent of a biological father.

598. As a result of the death of Mr. Goins, each member of the Goins Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Goins's society, companionship, and counsel.

The Wyatt A. Goldsmith Family

599. Sergeant First Class Wyatt A. Goldsmith served in Afghanistan as a member of the U.S. Army. On July 15, 2011, SFC Goldsmith was injured in a rocket propelled grenade attack committed by the Taliban in Helmand Province, Afghanistan. SFC Goldsmith died on July 15, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

600. SFC Goldsmith was a national of the United States at the time of the attack and his death.

601. Plaintiff John Wayne Goldsmith is the father of SFC Goldsmith. He is a national of the United States.

602. Plaintiff Lorie Goldsmith is the mother of SFC Goldsmith. She is a national of the United States.

603. As a result of the death of SFC Goldsmith, each member of the Goldsmith Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Goldsmith's society, companionship, and counsel.

The Kristopher J. Gould Family

604. Sergeant Kristopher J. Gould served in Afghanistan as a member of the U.S. Army. On February 27, 2011, SGT Gould was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Ghazni Province, Afghanistan. SGT Gould died on February 27, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

605. SGT Gould was a national of the United States at the time of the attack and his death.

606. Plaintiff Ann L. Gould is the mother of SGT Gould. She is a national of the United States.

607. Plaintiff James A. Gould is the father of SGT Gould. He is a national of the United States.

608. Plaintiff Julianna Symkowiak is the sister of SGT Gould. She is a national of the United States.

609. As a result of the death of SGT Gould, each member of the Gould Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Gould's society, companionship, and counsel.

The Alejandro Granado III Family

610. Sergeant First Class Alejandro Granado III served in Afghanistan as a member of the U.S. Army National Guard. On August 2, 2009, SFC Granado was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. SFC Granado died on August 2, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

611. SFC Granado was a national of the United States at the time of the attack and his death.

612. Plaintiff Hasson Granado is the son of SFC Granado. He is a national of the United States.

613. Plaintiff Susana Granado is the sister of SFC Granado. She is a national of the United States.

614. As a result of the death of SFC Granado, each member of the Granado Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Granado's society, companionship, and counsel.

The Anthony G. Green Family

615. Sergeant Anthony G. Green served in Afghanistan as a member of the U.S. Army National Guard. On October 16, 2009, SGT Green was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. SGT Green died

on October 16, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

616. SGT Green was a national of the United States at the time of the attack and his death.

617. Plaintiff Almuth Cornelius Green Jr. is the father of SGT Green. He is a national of the United States.

618. Plaintiff Patricia C. Green is the mother of SGT Green. She is a national of the United States.

619. As a result of the death of SGT Green, each member of the Green Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Green's society, companionship, and counsel.

The Douglas J. Green Family

620. Specialist Douglas J. Green served in Afghanistan as a member of the U.S. Army. On August 28, 2011, SPC Green was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Green died on August 28, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

621. SPC Green was a national of the United States at the time of the attack and his death.

622. Plaintiff Suni Chabrow is the mother of SPC Green. She is a national of the United States.

623. Plaintiff Kristin Caracciolo is the sister of SPC Green. She is a national of the United States.

624. Plaintiff Paige Erlanger is the sister of SPC Green. She is a national of the United States.

625. As a result of the death of SPC Green, each member of the Green Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Green's society, companionship, and counsel.

The Kevin D. Grieco Family

626. Staff Sergeant Kevin D. Grieco served in Afghanistan as a member of the U.S. Army National Guard. On October 27, 2008, SSG Grieco was injured in a suicide bombing attack committed by the Taliban in Baghlan Province, Afghanistan. SSG Grieco died on October 27, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

627. SSG Grieco was a national of the United States at the time of the attack and his death.

628. Plaintiff Linda K. Grieco is the mother of SSG Grieco. She is a national of the United States.

629. Plaintiff Ralph Grieco is the father of SSG Grieco. He is a national of the United States.

630. Plaintiff Jennifer Grieco Burch is the sister of SSG Grieco. She is a national of the United States.

631. As a result of the death of SSG Grieco, each member of the Grieco Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Grieco's society, companionship, and counsel.

The Matthias N. Hanson Family

632. Lance Corporal Matthias N. Hanson served in Afghanistan as a member of the U.S. Marine Corps. On February 21, 2010, LCpl Hanson was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Hanson died on February 21, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

633. LCpl Hanson was a national of the United States at the time of the attack and his death.

634. Plaintiff Lowell Hanson is the father of LCpl Hanson. He is a national of the United States.

635. Plaintiff Megan Kathleen Dohn is the sister of LCpl Hanson. She is a national of the United States.

636. Plaintiff Cynthia Hanson is the step-mother of LCpl Hanson. She is a national of the United States. Cynthia Hanson lived in the same household as LCpl Hanson for a substantial period of time and considered LCpl Hanson the functional equivalent of a biological son.

637. As a result of the death of LCpl Hanson, each member of the Hanson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Hanson's society, companionship, and counsel.

The Scott D. Harper Family

638. Lance Corporal Scott D. Harper served in Afghanistan as a member of the U.S. Marine Corps. On October 13, 2011, LCpl Harper was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Harper died on October 13, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

639. LCpl Harper was a national of the United States at the time of the attack and his death.

640. Plaintiff Brian Harper is the father of LCpl Harper. He is a national of the United States.

641. As a result of the death of LCpl Harper, each member of the Harper Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Harper's society, companionship, and counsel.

The Devon J. Harris Family

642. Private First Class Devon J. Harris served in Afghanistan as a member of the U.S. Army. On November 27, 2010, PFC Harris was injured in a rocket propelled grenade attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. PFC Harris died on November 27, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

643. PFC Harris was a national of the United States at the time of the attack and his death.

644. Plaintiff Sorainya Harris is the mother of PFC Harris. She is a national of the United States.

645. Plaintiff Tennyson Charles Harris is the father of PFC Harris. He is a national of the United States.

646. Plaintiff Tiffany Dotson is the sister of PFC Harris. She is a national of the United States.

647. Plaintiff Ashley Michelle Harris is the sister of PFC Harris. She is a national of the United States.

648. Plaintiff Christopher Wayne Johnson is the brother of PFC Harris. He is a national of the United States.

649. Plaintiff David L. Parker is the brother of PFC Harris. He is a national of the United States.

650. Plaintiff Felicia Ann Harris is the step-mother of PFC Harris. She is a national of the United States. Felicia Ann Harris lived in the same household as PFC Harris for a substantial period of time and considered PFC Harris the functional equivalent of a biological son.

651. Plaintiff Michael Rufus II is the step-brother of PFC Harris. He is a national of the United States. Michael Rufus II lived in the same household as PFC Harris for a substantial period of time and considered PFC Harris the functional equivalent of a biological brother.

652. Plaintiff Stephanie Rufus is the step-sister of PFC Harris. She is a national of the United States. Stephanie Rufus lived in the same household as PFC Harris for a substantial period of time and considered PFC Harris the functional equivalent of a biological brother.

653. As a result of the death of PFC Harris, each member of the Harris Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Harris's society, companionship, and counsel.

The Joshua A. Harton Family

654. Corporal Joshua A. Harton served in Afghanistan as a member of the U.S. Army. On September 18, 2010, CPL Harton was injured in a rocket propelled grenade attack committed by the Taliban in Faryab Province, Afghanistan. CPL Harton died on September 18, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

655. CPL Harton was a national of the United States at the time of the attack and his death.

656. Plaintiff Ruth M. Harton is the mother of CPL Harton. She is a national of the United States.

657. As a result of the death of CPL Harton, each member of the Harton Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Harton's society, companionship, and counsel.

The Christopher D. Henderson Family

658. Sergeant First Class Christopher D. Henderson served in Afghanistan as a member of the U.S. Army. On June 17, 2007, SFC Henderson was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SFC Henderson died on June 17, 2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

659. SFC Henderson was a national of the United States at the time of the attack and his death.

660. Plaintiff James Henderson is the father of SFC Henderson. He is a national of the United States.

661. As a result of the death of SFC Henderson, each member of the Henderson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Henderson's society, companionship, and counsel.

The Jose A. Hernandez Family

662. Lance Corporal Jose A. Hernandez served in Afghanistan as a member of the U.S. Marine Corps. On December 14, 2010, LCpl Hernandez was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Hernandez died on December 14, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

663. LCpl Hernandez was a national of the United States at the time of the attack and his death.

664. Plaintiff Evangeline Ferrera is the mother of LCpl Hernandez. She is a national of the United States.

665. As a result of the death of LCpl Hernandez, each member of the Hernandez Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Hernandez's society, companionship, and counsel.

The Daren M. Hidalgo Family

666. First Lieutenant Daren M. Hidalgo served in Afghanistan as a member of the U.S. Army. On February 20, 2011, 1LT Hidalgo was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. 1LT Hidalgo died on February 20, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

667. 1LT Hidalgo was a national of the United States at the time of the attack and his death.

668. Plaintiff Andrea Hidalgo is the mother of 1LT Hidalgo. She is a national of the United States.

669. Plaintiff Jorge Hidalgo is the father of 1LT Hidalgo. He is a national of the United States.

670. As a result of the death of 1LT Hidalgo, each member of the Hidalgo Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1LT Hidalgo's society, companionship, and counsel.

The Adrian E. Hike Family

671. Sergeant Adrian E. Hike served in Afghanistan as a member of the U.S. Army. On November 12, 2007, SGT Hike was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SGT Hike died on November 12, 2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

672. SGT Hike was a national of the United States at the time of the attack and his death.

673. Plaintiff Robert A. Bird is the step-father of SGT Hike. He is a national of the United States. Robert A. Bird lived in the same household as SGT Hike for a substantial period of time and considered SGT Hike the functional equivalent of a biological son.

674. As a result of the death of SGT Hike, each member of the Hike Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Hike's society, companionship, and counsel.

The Matthew L. Hilton Family

675. Sergeant First Class Matthew L. Hilton served in Afghanistan as a member of the U.S. Army National Guard. On June 26, 2008, SFC Hilton was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. SFC Hilton died on June 26, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

676. SFC Hilton was a national of the United States at the time of the attack and his death.

677. Plaintiff Mary Hilton is the widow of SFC Hilton. She is a national of the United States.

678. As a result of the death of SFC Hilton, each member of the Hilton Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Hilton's society, companionship, and counsel.

The Floyd E.C. Holley Family

679. Gunnery Sergeant Floyd E.C. Holley served in Afghanistan as a member of the U.S. Marine Corps. On August 29, 2010, GySgt Holley was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. GySgt Holley died on August 29, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

680. GySgt Holley was a national of the United States at the time of the attack and his death.

681. Plaintiff Dominic Giacchi is the brother of GySgt Holley. He is a national of the United States.

682. As a result of the death of GySgt Holley, each member of the Holley Family has experienced severe mental anguish, emotional pain and suffering, and the loss of GySgt Holley's society, companionship, and counsel.

Kevin Honaker

683. Plaintiff Lance Corporal Kevin Honaker served in Afghanistan as a member of the U.S. Marine Corps. On September 13, 2011, LCpl. Honaker was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded LCpl. Honaker, who lost his left leg above the knee, his right leg below the knee, and a finger on his left hand. The attack constituted an extrajudicial killing. As a result of the September 13,

2011 attack and his injuries, LCpl. Honaker has experienced severe physical and emotional pain and suffering.

684. LCpl. Honaker was a national of the United States at the time of the attack and remains one to this day.

The Chester W. Hosford Family

685. Sergeant Chester W. Hosford served in Afghanistan as a member of the U.S. Army National Guard. On July 6, 2009, SGT Hosford was injured in an IED attack committed by the Taliban in Kunduz Province, Afghanistan. SGT Hosford died on July 6, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

686. SGT Hosford was a national of the United States at the time of the attack and his death.

687. Plaintiff Tristyn Hosford is the son of SGT Hosford. He is a national of the United States.

688. As a result of the death of SGT Hosford, each member of the Hosford Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Hosford's society, companionship, and counsel.

The Jason D. Hovater Family

689. Specialist Jason D. Hovater served in Afghanistan as a member of the U.S. Army. On July 13, 2008, SPC Hovater was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Taliban and al-Qaeda, a designated FTO at the time of the attack, in Nuristan Province, Afghanistan. SPC Hovater died on July 13, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

690. SPC Hovater was a national of the United States at the time of the attack and his death.

691. Plaintiff Jenna Vanosdale is the widow of SPC Hovater. She is a national of the United States.

692. As a result of the death of SPC Hovater, each member of the Hovater Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Hovater's society, companionship, and counsel.

The Abram L. Howard Family

693. Lance Corporal Abram L. Howard served in Afghanistan as a member of the U.S. Marine Corps Reserves. On July 27, 2010, LCpl Howard was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Howard died on July 27, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

694. LCpl Howard was a national of the United States at the time of the attack and his death.

695. Plaintiff Bart LaRue Howard is the father of LCpl Howard. He is a national of the United States.

696. Plaintiff Constance Louise Howard is the mother of LCpl Howard. She is a national of the United States.

697. Plaintiff Alexander James Howard is the brother of LCpl Howard. He is a national of the United States.

698. Plaintiff Olivia Marie Howard is the sister of LCpl Howard. She is a national of the United States.

699. As a result of the death of LCpl Howard, each member of the Howard Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Howard's society, companionship, and counsel.

The Michael A. Hughes Family

700. Michael A. Hughes served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On February 10, 2014, Mr. Hughes was injured in an IED attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Mr. Hughes died on February 10, 2014 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

701. Mr. Hughes was a national of the United States at the time of the attack and his death.

702. Plaintiff Kristine Anne Zitny is the sister of Mr. Hughes. She is a national of the United States.

703. As a result of the death of Mr. Hughes, each member of the Hughes Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Hughes's society, companionship, and counsel.

The Eric M. Hunter Family

704. Plaintiff Sergeant Eric M. Hunter served in Afghanistan as a member of the U.S. Army. On May 31, 2012, SGT Hunter was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded SGT Hunter, who lost his right leg and suffered from a severely injured left leg, post-traumatic stress disorder, and a traumatic brain injury. The attack constituted an extrajudicial killing. As a result of the May 31, 2012

attack and his injuries, SGT Hunter has experienced severe physical and emotional pain and suffering.

705. SGT Hunter was a national of the United States at the time of the attack, and remains one to this day.

706. Plaintiff Kenna Hunter is the wife of SGT Hunter. She is a national of the United States.

707. Plaintiff J.H., by and through his next friend Kenna Hunter, is the minor son of SGT Hunter. He is a national of the United States.

708. Plaintiff K.H., by and through her next friend Kenna Hunter, is the minor daughter of SGT Hunter. She is a national of the United States.

709. As a result of the May 31, 2012 attack and SGT Hunter's injuries, each member of the Hunter Family has experienced severe mental anguish, emotional pain and suffering.

The Jesse Infante Family

710. Staff Sergeant Jesse Infante served in Afghanistan as a member of the U.S. Army. On August 30, 2010, SSG Infante was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSG Infante died on August 30, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

711. SSG Infante was a national of the United States at the time of the attack and his death.

712. Plaintiff Jesus Infante is the father of SSG Infante. He is a national of the United States.

713. Plaintiff Jessica Infante is the sister of SSG Infante. She is a national of the United States.

714. Plaintiff Juan Infante is the brother of SSG Infante. He is a national of the United States.

715. As a result of the death of SSG Infante, each member of the Infante Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Infante's society, companionship, and counsel.

The Michael K. Ingram Jr. Family

716. Sergeant Michael K. Ingram Jr. served in Afghanistan as a member of the U.S. Army. On April 17, 2010, SGT Ingram was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SGT Ingram died on April 17, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

717. SGT Ingram was a national of the United States at the time of the attack and his death.

718. Plaintiff Michael K. Ingram Sr. is the father of SGT Ingram. He is a national of the United States.

719. Plaintiff Julie Ingram is the step-mother of SGT Ingram. She is a national of the United States. Julie Ingram lived in the same household as SGT Ingram for a substantial period of time and considered SGT Ingram the functional equivalent of a biological son.

720. As a result of the death of SGT Ingram, each member of the Ingram Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Ingram's society, companionship, and counsel.

The Ryan P. Jayne Family

721. Specialist Ryan P. Jayne served in Afghanistan as a member of the U.S. Army Reserve. On November 3, 2012, SPC Jayne was injured in an IED attack committed by the

Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Paktia Province, Afghanistan. SPC Jayne died on November 3, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

722. SPC Jayne was a national of the United States at the time of the attack and his death.

723. Plaintiff Paul Elmer Jayne is the father of SPC Jayne. He is a national of the United States.

724. As a result of the death of SPC Jayne, each member of the Jayne Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Jayne's society, companionship, and counsel.

The Timothy L. Johnson Family

725. Specialist Timothy L. Johnson served in Afghanistan as a member of the U.S. Army. On September 16, 2010, SPC Johnson was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SPC Johnson died on September 16, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

726. SPC Johnson was a national of the United States at the time of the attack and his death.

727. Plaintiff Cheryl Johnson is the mother of SPC Johnson. She is a national of the United States.

728. As a result of the death of SPC Johnson, each member of the Johnson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Johnson's society, companionship, and counsel.

The Denis D. Kisseloff Family

729. Sergeant Denis D. Kisseloff served in Afghanistan as a member of the U.S. Army National Guard. On May 14, 2010, SGT Kisseloff was injured in a rocket propelled grenade attack committed by the Haqqani Network, a part of the Taliban, in Logar Province, Afghanistan. SGT Kisseloff died on May 14, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

730. SGT Kisseloff was a national of the United States at the time of the attack and his death.

731. Plaintiff Michael Kisseloff is the father of SGT Kisseloff. He is a national of the United States.

732. Plaintiff Milagros Kisseloff is the mother of SGT Kisseloff. She is a national of the United States.

733. As a result of the death of SGT Kisseloff, each member of the Kisseloff Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Kisseloff's society, companionship, and counsel.

Edward Klein

734. Plaintiff Major Edward Klein served in Afghanistan as a member of the U.S. Army. On October 22, 2012, MAJ Klein was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. The attack severely wounded MAJ Klein, who lost both legs above the knee, his right arm, and three fingers on his left hand. The attack constituted an extrajudicial killing. As a result of the October 22, 2012 attack and his injuries, MAJ Klein has experienced severe physical and emotional pain and suffering.

735. MAJ Klein was a national of the United States at the time of the attack and remains one to this day.

Brandon Korona

736. Plaintiff Sergeant Brandon Korona served in Afghanistan as a member of the U.S. Army. On June 23, 2013, SGT Korona was injured in an IED attack committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Paktika Province, Afghanistan. The attack severely wounded SGT Korona, who suffered from significant injuries to his left leg requiring a below knee amputation in 2017, a fractured right ankle, and a traumatic brain injury. The attack constituted an extrajudicial killing. As a result of the June 23, 2013 attack and his injuries, SGT Korona has experienced severe physical and emotional pain and suffering.

737. SGT Korona was a national of the United States at the time of the attack and remains one to this day.

The Patrick F. Kutschbach Family

738. Staff Sergeant Patrick F. Kutschbach served in Afghanistan as a member of the U.S. Army. On November 10, 2007, SSG Kutschbach was injured in a rocket propelled grenade attack committed by the Taliban in Kapisa Province, Afghanistan. SSG Kutschbach died on November 10, 2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

739. SSG Kutschbach was a national of the United States at the time of the attack and his death.

740. Plaintiff Ginger Kutschbach is the widow of SSG Kutschbach. She is a national of the United States.

741. As a result of the death of SSG Kutschbach, each member of the Kutschbach Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Kutschbach's society, companionship, and counsel.

The Brandon J. Landrum Family

742. First Lieutenant Brandon J. Landrum served in Afghanistan as a member of the U.S. Army. On May 4, 2013, 1LT Landrum was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. 1LT Landrum died on May 4, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

743. 1LT Landrum was a national of the United States at the time of the attack and his death.

744. Plaintiff Miranda Landrum is the widow of 1LT Landrum. She is a national of the United States.

745. Plaintiff B.R.L., by and through her next friend Miranda Landrum, is the minor daughter of 1LT Landrum. She is a national of the United States.

746. Plaintiff G.B.L., by and through his next friend Miranda Landrum, is the minor son of 1LT Landrum. He is a national of the United States.

747. Plaintiff James R. Landrum is the father of 1LT Landrum. He is a national of the United States.

748. Plaintiff Janet Landrum is the mother of 1LT Landrum. She is a national of the United States.

749. As a result of the death of 1LT Landrum, each member of the Landrum Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1LT Landrum's society, companionship, and counsel.

The Jacob C. Leicht Family

750. Corporal Jacob C. Leicht served in Afghanistan as a member of the U.S. Marine Corps. On May 27, 2010, Cpl Leicht was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Cpl Leicht died on May 27, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

751. Cpl Leicht was a national of the United States at the time of the attack and his death.

752. Plaintiff Craig Leicht is the father of Cpl Leicht. He is a national of the United States.

753. Plaintiff Shirley A. Leicht is the mother of Cpl Leicht. She is a national of the United States.

754. Plaintiff Elizabeth C. Leicht is the sister of Cpl Leicht. She is a national of the United States.

755. Plaintiff Jesse H. Leicht is the brother of Cpl Leicht. He is a national of the United States.

756. Plaintiff Jonathan Leicht is the brother of Cpl Leicht. He is a national of the United States.

757. Plaintiff Mary Rose Leicht is the sister of Cpl Leicht. She is a national of the United States.

758. Plaintiff Sarah Grace Leicht is the sister of Cpl Leicht. She is a national of the United States.

759. As a result of the death of Cpl Leicht, each member of the Leicht Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Cpl Leicht's society, companionship, and counsel.

The Jared Satoshi Lemon Family

760. Plaintiff Sergeant Jared Satoshi Lemon served in Afghanistan as a member of the U.S. Army. On April 11, 2010, SGT Lemon was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded SGT Lemon, who suffered from a compound fracture of his right arm, requiring amputation, shrapnel injuries to his head and back, post traumatic stress disorder, and a traumatic brain injury. The attack constituted an extrajudicial killing. As a result of the April 11, 2010 attack and his injuries, SGT Lemon has experienced severe physical and emotional pain and suffering.

761. SGT Lemon was a national of the United States at the time of the attack, and remains one to this day.

762. Plaintiff K.E.L., by and through her next friend Jared Satoshi Lemon, is the minor daughter of SGT Lemon. She is a national of the United States.

763. Plaintiff Frank L. Lemon is the father of SGT Lemon. He is a national of the United States.

764. Plaintiff Jackie L. Lemon is the mother of SGT Lemon. She is a national of the United States.

765. Plaintiff Benjamin Lemon is the brother of SGT Lemon. He is a national of the United States.

766. Plaintiff Matthew C. S. Lemon is the brother of SGT Lemon. He is a national of the United States.

767. Plaintiff Nathan Kenji Lemon is the brother of SGT Lemon. He is a national of the United States.

768. As a result of the April 11, 2010 attack and SGT Lemon's injuries, each member of the Lemon Family has experienced severe mental anguish, emotional pain and suffering.

The Andrew R. Looney Family

769. Sergeant Andrew R. Looney served in Afghanistan as a member of the U.S. Army. On June 21, 2010, SGT Looney was injured in a suicide bombing attack committed by the Taliban in Kunar Province, Afghanistan. SGT Looney died on June 21, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

770. SGT Looney was a national of the United States at the time of the attack and his death.

771. Plaintiff C. Richard Looney is the father of SGT Looney. He is a national of the United States.

772. Plaintiff Martha Looney is the mother of SGT Looney. She is a national of the United States.

773. As a result of the death of SGT Looney, each member of the Looney Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Looney's society, companionship, and counsel.

The Russell E. Madden Family

774. Specialist Russell E. Madden served in Afghanistan as a member of the U.S. Army. On June 23, 2010, SPC Madden was injured in a rocket attack committed by the Taliban in Kunar Province, Afghanistan. SPC Madden died on June 23, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

775. SPC Madden was a national of the United States at the time of the attack and his death.

776. Plaintiff Michael Davitt is the step-father of SPC Madden. He is a national of the United States. Michael Davitt lived in the same household as SPC Madden for a substantial period of time and considered SPC Madden the functional equivalent of a biological son.

777. As a result of the death of SPC Madden, each member of the Madden Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Madden's society, companionship, and counsel.

The Kyle Malin Family

778. Plaintiff Staff Sergeant Kyle Malin served in Afghanistan as a member of the U.S. Army. On July 12, 2010, SSG Malin was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. The attack severely wounded SSG Malin, who lost both his legs above the knee. The attack constituted an extrajudicial killing. As a result of the July 12, 2010 attack and his injuries, SSG Malin has experienced severe physical and emotional pain and suffering.

779. SSG Malin was a national of the United States at the time of the attack, and remains one to this day.

780. Plaintiff Alicia Malin is the wife of SSG Malin. She is a national of the United States.

781. Plaintiff C.M., by and through his next friend Alicia Malin, is the minor son of SSG Malin. He is a national of the United States.

782. Plaintiff K.M., by and through his next friend Alicia Malin, is the minor son of SSG Malin. He is a national of the United States.

783. As a result of the July 12, 2010 attack and SSG Malin's injuries, each member of the Malin Family has experienced severe mental anguish, emotional pain and suffering.

The Chase S. Marta Family

784. Specialist Chase S. Marta served in Afghanistan as a member of the U.S. Army. On May 7, 2012, SPC Marta was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Ghazni Province, Afghanistan. SPC Marta died on May 7, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

785. SPC Marta was a national of the United States at the time of the attack and his death.

786. Plaintiff Taylor Marta is the sister of SPC Marta. She is a national of the United States.

787. As a result of the death of SPC Marta, each member of the Marta Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Marta's society, companionship, and counsel.

The Ethan J. Martin Family

788. Corporal Ethan J. Martin served in Afghanistan as a member of the U.S. Army. On August 7, 2012, CPL Martin was injured in an insider attack committed by the Haqqani Network, a part of the Taliban, in Paktia Province, Afghanistan. CPL Martin died on August 7, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

789. CPL Martin was a national of the United States at the time of the attack and his death.

790. Plaintiff Kristie Surprenant is the mother of CPL Martin. She is a national of the United States.

791. Plaintiff Bob Surprenant is the step-father of CPL Martin. He is a national of the United States. Bob Surprenant lived in the same household as CPL Martin for a substantial period of time and considered CPL Martin the functional equivalent of a biological son.

792. As a result of the death of CPL Martin, each member of the Martin Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Martin's society, companionship, and counsel.

The Wyatt J. Martin Family

793. Specialist Wyatt J. Martin served in Afghanistan as a member of the U.S. Army. On December 12, 2014, SPC Martin was injured in a command wire-detonated IED attack committed by the Taliban in Parwan Province, Afghanistan. SPC Martin died on December 12, 2014 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

794. SPC Martin was a national of the United States at the time of the attack and his death.

795. Plaintiff Brian M. Martin is the father of SPC Martin. He is a national of the United States.

796. Plaintiff Julie K. Martin is the mother of SPC Martin. She is a national of the United States.

797. Plaintiff Catherine G. Martin is the sister of SPC Martin. She is a national of the United States.

798. Plaintiff Elizabeth A. Martin is the sister of SPC Martin. She is a national of the United States.

799. As a result of the death of SPC Martin, each member of the Martin Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Martin's society, companionship, and counsel.

The Chauncy R. Mays Family

800. Staff Sergeant Chauncy R. Mays served in Afghanistan as a member of the U.S. Army. On February 28, 2011, SSG Mays was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. SSG Mays died on February 28, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

801. SSG Mays was a national of the United States at the time of the attack and his death.

802. Plaintiff Thomas Pierce Mays is the father of SSG Mays. He is a national of the United States.

803. Plaintiff Alyson Overman Rodgers is the mother of SSG Mays. She is a national of the United States.

804. Plaintiff Cody Cheyenne Mays is the brother of SSG Mays. He is a national of the United States.

805. Plaintiff Tammy Renee Mays is the step-mother of SSG Mays. She is a national of the United States. Tammy Renee Mays lived in the same household as SSG Mays for a substantial period of time and considered SSG Mays the functional equivalent of a biological son.

806. As a result of the death of SSG Mays, each member of the Mays Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Mays's society, companionship, and counsel.

The Mecolus C. McDaniel Family

807. Staff Sergeant Mecolus C. McDaniel served in Afghanistan as a member of the U.S. Army. On March 19, 2011, SSG McDaniel was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Khost Province, Afghanistan. SSG McDaniel died on March 19, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

808. SSG McDaniel was a national of the United States at the time of the attack and his death.

809. Plaintiff Sonja McDaniel is the widow of SSG McDaniel. She is a national of the United States.

810. Plaintiff M.M., by and through his next friend Sonja McDaniel, is the minor son of SSG McDaniel. He is a national of the United States.

811. Plaintiff J.G., by and through his next friend Sonja McDaniel, is the minor step-son of SSG McDaniel. He is a national of the United States. J.G. lived in the same household as SSG McDaniel for a substantial period of time and considered SSG McDaniel the functional equivalent of a biological father.

812. Plaintiff Charlette Gilbert is the step-daughter of SSG McDaniel. She is a national of the United States. Charlette Gilbert lived in the same household as SSG McDaniel for a substantial period of time and considered SSG McDaniel the functional equivalent of a biological father.

813. Plaintiff Charmaine Renee Gilbert is the step-daughter of SSG McDaniel. She is a national of the United States. Charmaine Renee Gilbert lived in the same household as SSG McDaniel for a substantial period of time and considered SSG McDaniel the functional equivalent of a biological father.

814. Plaintiff Jasmine Thomas is the step-daughter of SSG McDaniel. She is a national of the United States. Jasmine Thomas lived in the same household as SSG McDaniel for a substantial period of time and considered SSG McDaniel the functional equivalent of a biological father.

815. As a result of the death of SSG McDaniel, each member of the McDaniel Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG McDaniel's society, companionship, and counsel.

The Richard P. McEvoy Family

816. Richard P. McEvoy served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On August 22, 2015, Mr. McEvoy was injured in a suicide bombing attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Mr. McEvoy died on August 22, 2015 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

817. Mr. McEvoy was a national of the United States at the time of the attack and his death.

818. Plaintiff Kathleen McEvoy is the widow of Mr. McEvoy. She is a national of the United States.

819. Plaintiff Michelle Rose McEvoy is the daughter of Mr. McEvoy. She is a national of the United States.

820. Plaintiff Patrick Charles McEvoy is the son of Mr. McEvoy. He is a national of the United States.

821. Plaintiff Janice H. Proctor is the mother of Mr. McEvoy. She is a national of the United States.

822. As a result of the death of Mr. McEvoy, each member of the McEvoy Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. McEvoy's society, companionship, and counsel.

The Thomas P. McGee Family

823. Sergeant Thomas P. McGee served in Afghanistan as a member of the U.S. Army. On July 6, 2007, SGT McGee was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SGT McGee died on July 6, 2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

824. SGT McGee was a national of the United States at the time of the attack and his death.

825. Plaintiff Sylvia McGee is the mother of SGT McGee. She is a national of the United States.

826. Plaintiff Thomas McGee is the father of SGT McGee. He is a national of the United States.

827. Plaintiff Corey McGee is the brother of SGT McGee. He is a national of the United States.

828. As a result of the death of SGT McGee, each member of the McGee Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT McGee's society, companionship, and counsel.

The Jason A. McLeod Family

829. Sergeant Jason A. McLeod served in Afghanistan as a member of the U.S. Army. On November 23, 2009, SGT McLeod was injured in a mortar attack committed by the Taliban in Kandahar Province, Afghanistan. SGT McLeod died on November 23, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

830. SGT McLeod was a national of the United States at the time of the attack and his death.

831. Plaintiff Aimee Wood is the widow of SGT McLeod. She is a national of the United States.

832. Plaintiff J.M., by and through her next friend Aimee Wood, is the minor daughter of SGT McLeod. She is a national of the United States.

833. As a result of the death of SGT McLeod, each member of the McLeod Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT McLeod's society, companionship, and counsel.

The Richard L. McNulty III Family

834. Private First Class Richard L. McNulty III served in Afghanistan as a member of the U.S. Army. On May 13, 2012, PFC McNulty was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Khost Province, Afghanistan. PFC McNulty died on May 13, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

835. PFC McNulty was a national of the United States at the time of the attack and his death.

836. Plaintiff Shannon K. McNulty is the sister of PFC McNulty. She is a national of the United States.

837. As a result of the death of PFC McNulty, each member of the McNulty Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC McNulty's society, companionship, and counsel.

The Dale W. Means Family

838. Lance Corporal Dale W. Means served in Afghanistan as a member of the U.S. Marine Corps. On November 18, 2012, LCpl Means was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. LCpl Means died on November 18, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

839. LCpl Means was a national of the United States at the time of the attack and his death.

840. Plaintiff John Means is the father of LCpl Means. He is a national of the United States.

841. As a result of the death of LCpl Means, each member of the Means Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Means's society, companionship, and counsel.

Nicholas D. Mendes

842. Plaintiff Sergeant Nicholas D. Mendes served in Afghanistan as a member of the U.S. Army. On April 30, 2011, SGT Mendes was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. The attack severely wounded SGT Mendes, who was paralyzed from neck down. The attack constituted an extrajudicial killing. As a result of the

April 30, 2011 attack and his injuries, SGT Mendes has experienced severe physical and emotional pain and suffering.

843. SGT Mendes was a national of the United States at the time of the attack and remains one to this day.

The Paul J. Miller Family

844. Corporal Paul J. Miller served in Afghanistan as a member of the U.S. Marine Corps. On July 19, 2010, Cpl Miller was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Cpl Miller died on July 19, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

845. Cpl Miller was a national of the United States at the time of the attack and his death.

846. Plaintiff Sarah Beth Miller Morgan is the widow of Cpl Miller. She is a national of the United States.

847. As a result of the death of Cpl Miller, each member of the Miller Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Cpl Miller's society, companionship, and counsel.

The Shaun M. Mittler Family

848. Staff Sergeant Shaun M. Mittler served in Afghanistan as a member of the U.S. Army. On July 10, 2010, SSG Mittler was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Taliban in Kunar Province, Afghanistan. SSG Mittler died on July 10, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

849. SSG Mittler was a national of the United States at the time of the attack and his death.

850. Plaintiff Terry Mittler is the father of SSG Mittler. He is a national of the United States.

851. As a result of the death of SSG Mittler, each member of the Mittler Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Mittler's society, companionship, and counsel.

The Travis A. Morgado Family

852. Second Lieutenant Travis A. Morgado served in Afghanistan as a member of the U.S. Army. On May 23, 2012, 2LT Morgado was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. 2LT Morgado died on May 23, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

853. 2LT Morgado was a national of the United States at the time of the attack and his death.

854. Plaintiff Andrea Kessler is the mother of 2LT Morgado. She is a national of the United States.

855. Plaintiff Jose Alberto Morgado is the father of 2LT Morgado. He is a national of the United States.

856. As a result of the death of 2LT Morgado, each member of the Morgado Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 2LT Morgado's society, companionship, and counsel.

The Donald S. Morrison Family

857. Specialist Donald S. Morrison served in Afghanistan as a member of the U.S. Army. On September 26, 2010, SPC Morrison was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Morrison died on September 26, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

858. SPC Morrison was a national of the United States at the time of the attack and his death.

859. Plaintiff Susan Morrison is the mother of SPC Morrison. She is a national of the United States.

860. As a result of the death of SPC Morrison, each member of the Morrison Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Morrison's society, companionship, and counsel.

The Brandon S. Mullins Family

861. Specialist Brandon S. Mullins served in Afghanistan as a member of the U.S. Army. On August 25, 2011, SPC Mullins was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Mullins died on August 25, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

862. SPC Mullins was a national of the United States at the time of the attack and his death.

863. Plaintiff Catherine Mullins is the mother of SPC Mullins. She is a national of the United States.

864. Plaintiff Thomas Mullins is the father of SPC Mullins. He is a national of the United States.

865. Plaintiff Bethany Rose Mullins Randall is the sister of SPC Mullins. She is a national of the United States.

866. As a result of the death of SPC Mullins, each member of the Mullins Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Mullins's society, companionship, and counsel.

The Thomas Paige Murach Family

867. Specialist Thomas Paige Murach served in Afghanistan as a member of the U.S. Army. On May 4, 2013, SPC Murach was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Murach died on May 4, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

868. SPC Murach was a national of the United States at the time of the attack and his death.

869. Plaintiff Chet Murach is the father of SPC Murach. He is a national of the United States.

870. As a result of the death of SPC Murach, each member of the Murach Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Murach's society, companionship, and counsel.

The Christopher R. Newman Family

871. Staff Sergeant Christopher R. Newman served in Afghanistan as a member of the U.S. Army. On October 29, 2011, SSG Newman was injured in a suicide bombing attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. SSG Newman died on October 29, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

872. SSG Newman was a national of the United States at the time of the attack and his death.

873. Plaintiff Amanda Newman is the widow of SSG Newman. She is a national of the United States.

874. Plaintiff Derrick Anthony Davis is the brother of SSG Newman. He is a national of the United States.

875. As a result of the death of SSG Newman, each member of the Newman Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Newman's society, companionship, and counsel.

The Jamie S. Nicholas Family

876. Sergeant First Class Jamie S. Nicholas served in Afghanistan as a member of the U.S. Army. On September 29, 2008, SFC Nicholas was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SFC Nicholas died on September 29, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

877. SFC Nicholas was a national of the United States at the time of the attack and his death.

878. Plaintiff Michelle M. Nicholas is the widow of SFC Nicholas. She is a national of the United States.

879. As a result of the death of SFC Nicholas, each member of the Nicholas Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Nicholas's society, companionship, and counsel.

The Bryan J. Nichols Family

880. Chief Warrant Officer 2 Bryan J. Nichols served in Afghanistan as a member of the U.S. Army National Guard. On August 6, 2011, CW2 Nichols was injured in an attack on a Chinook helicopter committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. CW2 Nichols died on August 6, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

881. CW2 Nichols was a national of the United States at the time of the attack and his death.

882. Plaintiff Cynthia Nichols is the mother of CW2 Nichols. She is a national of the United States.

883. Plaintiff Douglas Nichols is the father of CW2 Nichols. He is a national of the United States.

884. As a result of the death of CW2 Nichols, each member of the Nichols Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CW2 Nichols's society, companionship, and counsel.

The Andrew C. Nicol Family

885. Sergeant Andrew C. Nicol served in Afghanistan as a member of the U.S. Army. On August 8, 2010, SGT Nicol was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SGT Nicol died on August 8, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

886. SGT Nicol was a national of the United States at the time of the attack and his death.

887. Plaintiff Patricia A. Nicol is the mother of SGT Nicol. She is a national of the United States.

888. Plaintiff Roland N. Nicol is the father of SGT Nicol. He is a national of the United States.

889. Plaintiff Alaina Nicol is the sister of SGT Nicol. She is a national of the United States.

890. Plaintiff Roland J. Nicol is the brother of SGT Nicol. He is a national of the United States.

891. As a result of the death of SGT Nicol, each member of the Nicol Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Nicol's society, companionship, and counsel.

The Adam J. Novak Family

892. Private Adam J. Novak served in Afghanistan as a member of the U.S. Army. On August 27, 2010, PVT Novak was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktia Province, Afghanistan. PVT Novak died on August 27, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

893. PVT Novak was a national of the United States at the time of the attack and his death.

894. Plaintiff Susan Novak is the mother of PVT Novak. She is a national of the United States.

895. As a result of the death of PVT Novak, each member of the Novak Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PVT Novak's society, companionship, and counsel.

The Nicholas S. Ott Family

896. Corporal Nicholas S. Ott served in Afghanistan as a member of the U.S. Marine Corps. On August 10, 2011, Cpl Ott was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Cpl Ott died on August 10, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

897. Cpl Ott was a national of the United States at the time of the attack and his death.

898. Plaintiff Julia Ott is the sister of Cpl Ott. She is a national of the United States.

899. As a result of the death of Cpl Ott, each member of the Ott Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Cpl Ott's society, companionship, and counsel.

The Isaac Palomarez Family

900. Sergeant Isaac Palomarez served in Afghanistan as a member of the U.S. Army. On May 9, 2008, SGT Palomarez was injured in an IED attack committed by the Taliban in Kapisa Province, Afghanistan. SGT Palomarez died on May 9, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

901. SGT Palomarez was a national of the United States at the time of the attack and his death.

902. Plaintiff Elma Garza Palomarez is the mother of SGT Palomarez. She is a national of the United States.

903. Plaintiff Candido Palomarez III is the brother of SGT Palomarez. He is a national of the United States.

904. Plaintiff Omar Palomarez is the brother of SGT Palomarez. He is a national of the United States.

905. Plaintiff Rene Palomarez is the brother of SGT Palomarez. He is a national of the United States.

906. As a result of the death of SGT Palomarez, each member of the Palomarez Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Palomarez's society, companionship, and counsel.

The Jason R. Parsons Family

907. Sergeant Jason R. Parsons served in Afghanistan as a member of the U.S. Army. On January 9, 2009, SGT Parsons was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Zabul Province, Afghanistan. SGT Parsons died on January 9, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

908. SGT Parsons was a national of the United States at the time of the attack and his death.

909. Plaintiff Garland Parsons is the father of SGT Parsons. He is a national of the United States.

910. Plaintiff Cathy Parsons is the step-mother of SGT Parsons. She is a national of the United States. Cathy Parsons lived in the same household as SGT Parsons for a substantial period of time and considered SGT Parsons the functional equivalent of a biological son.

911. As a result of the death of SGT Parsons, each member of the Parsons Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Parsons's society, companionship, and counsel.

The Justin R. Pellerin Family

912. Specialist Justin R. Pellerin served in Afghanistan as a member of the U.S. Army. On August 20, 2009, SPC Pellerin was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. SPC Pellerin died on August 20, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

913. SPC Pellerin was a national of the United States at the time of the attack and his death.

914. Plaintiff Chelsey Pellerin is the widow of SPC Pellerin. She is a national of the United States.

915. As a result of the death of SPC Pellerin, each member of the Pellerin Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Pellerin's society, companionship, and counsel.

The Joseph Michael Peters Family

916. Sergeant Joseph Michael Peters served in Afghanistan as a member of the U.S. Army. On October 6, 2013, SGT Peters was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SGT Peters died on October 6, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

917. SGT Peters was a national of the United States at the time of the attack and his death.

918. Plaintiff Ashley Peters is the widow of SGT Peters. She is a national of the United States.

919. Plaintiff G.R.P., by and through his next friend Ashley Peters, is the minor son of SGT Peters. He is a national of the United States.

920. Plaintiff Deborah Jean Peters is the mother of SGT Peters. She is a national of the United States.

921. Plaintiff Dennis W. Peters is the father of SGT Peters. He is a national of the United States.

922. As a result of the death of SGT Peters, each member of the Peters Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Peters's society, companionship, and counsel.

The Jared C. Plunk Family

923. Specialist Jared C. Plunk served in Afghanistan as a member of the U.S. Army. On June 25, 2010, SPC Plunk was injured in a complex attack involving rocket propelled grenades and small-arms fire committed by the Taliban in Kunar Province, Afghanistan. SPC Plunk died on June 25, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

924. SPC Plunk was a national of the United States at the time of the attack and his death.

925. Plaintiff Glenda Willard is the mother of SPC Plunk. She is a national of the United States.

926. Plaintiff Ranee Massoni is the sister of SPC Plunk. She is a national of the United States.

927. Plaintiff Jordan Plunk is the brother of SPC Plunk. He is a national of the United States.

928. Plaintiff Justin T. Plunk is the brother of SPC Plunk. He is a national of the United States.

929. As a result of the death of SPC Plunk, each member of the Plunk Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Plunk's society, companionship, and counsel.

The Brandon Joseph Prescott Family

930. Specialist Brandon Joseph Prescott served in Afghanistan as a member of the U.S. Army. On May 4, 2013, SPC Prescott was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Prescott died on May 4, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

931. SPC Prescott was a national of the United States at the time of the attack and his death.

932. Plaintiff Aaron William Prescott is the brother of SPC Prescott. He is a national of the United States.

933. Plaintiff Jacob Richard Prescott is the brother of SPC Prescott. He is a national of the United States.

934. Plaintiff Joshua Michael Prescott is the brother of SPC Prescott. He is a national of the United States.

935. As a result of the death of SPC Prescott, each member of the Prescott Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Prescott's society, companionship, and counsel.

The Lucas Todd Pyeatt Family

936. Corporal Lucas Todd Pyeatt served in Afghanistan as a member of the U.S. Marine Corps. On February 5, 2011, Cpl Pyeatt was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Cpl Pyeatt died on February 5, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

937. Cpl Pyeatt was a national of the United States at the time of the attack and his death.

938. Plaintiff Cynthia L. Pyeatt is the mother of Cpl Pyeatt. She is a national of the United States.

939. Plaintiff Lon Scott Pyeatt is the father of Cpl Pyeatt. He is a national of the United States.

940. Plaintiff Emily Smalley is the sister of Cpl Pyeatt. She is a national of the United States.

941. As a result of the death of Cpl Pyeatt, each member of the Pyeatt Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Cpl Pyeatt's society, companionship, and counsel.

The Pruitt A. Rainey Family

942. Corporal Pruitt A. Rainey served in Afghanistan as a member of the U.S. Army. On July 13, 2008, CPL Rainey was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Taliban and al-Qaeda, a designated FTO at the time of the attack, in Nuristan Province, Afghanistan. CPL Rainey died on July 13, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

943. CPL Rainey was a national of the United States at the time of the attack and his death.

944. Plaintiff Renda Riggins is the mother of CPL Rainey. She is a national of the United States.

945. As a result of the death of CPL Rainey, each member of the Rainey Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Rainey's society, companionship, and counsel.

The Thomas A. Ratzlaff Family

946. Special Warfare Operator Senior Chief Petty Officer (SEAL) Thomas A. Ratzlaff served in Afghanistan as a member of the U.S. Navy. On August 6, 2011, CPO (SEAL) Ratzlaff was injured in an attack on a Chinook helicopter committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. CPO (SEAL) Ratzlaff died on August 6, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

947. CPO (SEAL) Ratzlaff was a national of the United States at the time of the attack and his death.

948. Plaintiff Andrea N. Ratzlaff is the widow of CPO (SEAL) Ratzlaff. She is a national of the United States.

949. As a result of the death of CPO (SEAL) Ratzlaff, each member of the Ratzlaff Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPO (SEAL) Ratzlaff's society, companionship, and counsel.

The Jesse D. Reed Family

950. Specialist Jesse D. Reed served in Afghanistan as a member of the U.S. Army. On July 14, 2010, SPC Reed was injured in an IED attack committed by the Haqqani Network, a

part of the Taliban, in Zabul Province, Afghanistan. SPC Reed died on July 14, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

951. SPC Reed was a national of the United States at the time of the attack and his death.

952. Plaintiff Heather L. Reed is the widow of SPC Reed. She is a national of the United States.

953. Plaintiff Dolores A. Reed is the mother of SPC Reed. She is a national of the United States.

954. As a result of the death of SPC Reed, each member of the Reed Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Reed's society, companionship, and counsel.

The Marc A. Retmier Family

955. Hospitalman Marc A. Retmier served in Afghanistan as a member of the U.S. Navy. On June 18, 2008, HM Retmier was injured in a rocket attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. HM Retmier died on June 18, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

956. HM Retmier was a national of the United States at the time of the attack and his death.

957. Plaintiff Joy L. Retmier is the mother of HM Retmier. She is a national of the United States.

958. Plaintiff Steven C. Retmier is the father of HM Retmier. He is a national of the United States.

959. Plaintiff Mason D. Retmier is the brother of HM Retmier. He is a national of the United States.

960. Plaintiff Matthew S. Retmier is the brother of HM Retmier. He is a national of the United States.

961. As a result of the death of HM Retmier, each member of the Retmier Family has experienced severe mental anguish, emotional pain and suffering, and the loss of HM Retmier's society, companionship, and counsel.

The Joshua J. Rimer Family

962. Sergeant Joshua J. Rimer served in Afghanistan as a member of the U.S. Army. On July 22, 2009, SGT Rimer was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Zabul Province, Afghanistan. SGT Rimer died on July 22, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

963. SGT Rimer was a national of the United States at the time of the attack and his death.

964. Plaintiff Donna Rimer is the mother of SGT Rimer. She is a national of the United States.

965. Plaintiff James Rimer is the father of SGT Rimer. He is a national of the United States.

966. As a result of the death of SGT Rimer, each member of the Rimer Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Rimer's society, companionship, and counsel.

The Michael E. Ristau Family

967. Sergeant Michael E. Ristau served in Afghanistan as a member of the U.S. Army. On July 13, 2012, SGT Ristau was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Zabul Province, Afghanistan. SGT Ristau died on July 13, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

968. SGT Ristau was a national of the United States at the time of the attack and his death.

969. Plaintiff Randy Ristau is the father of SGT Ristau. He is a national of the United States.

970. Plaintiff H.R., by and through her next friend Randy Ristau, is the minor sister of SGT Ristau. She is a national of the United States.

971. Plaintiff Suzanne Ristau is the step-mother of SGT Ristau. She is a national of the United States. Suzanne Ristau lived in the same household as SGT Ristau for a substantial period of time and considered SGT Ristau the functional equivalent of a biological son.

972. Plaintiff Christopher Powers is the step-brother of SGT Ristau. He is a national of the United States. Christopher Powers lived in the same household as SGT Ristau for a substantial period of time and considered SGT Ristau the functional equivalent of a biological brother.

973. As a result of the death of SGT Ristau, each member of the Ristau Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Ristau's society, companionship, and counsel.

The Edgar N. Roberts III Family

974. Sergeant First Class Edgar N. Roberts III served in Afghanistan as a member of the U.S. Army National Guard. On June 26, 2010, SFC Roberts was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Wardak Province, Afghanistan. SFC Roberts died on August 17, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

975. SFC Roberts was a national of the United States at the time of the attack and his death.

976. Plaintiff E.N.R., by and through his next friend Jannett Cecilia Roberts, is the minor son of SFC Roberts. He is a national of the United States.

977. Plaintiff Miguel Angel Nathaniel Roberts is the son of SFC Roberts. He is a national of the United States.

978. Plaintiff Miriatliz Roberts is the daughter of SFC Roberts. She is a national of the United States.

979. As a result of the death of SFC Roberts, each member of the Roberts Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Roberts's society, companionship, and counsel.

The Simone A. Robinson Family

980. Sergeant Simone A. Robinson served in Afghanistan as a member of the U.S. Army National Guard. On January 17, 2009, SGT Robinson was injured in an IED attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. SGT Robinson died on March 1, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

981. SGT Robinson was a national of the United States at the time of the attack and her death.

982. Plaintiff Regina Byther is the mother of SGT Robinson. She is a national of the United States.

983. As a result of the death of SGT Robinson, each member of the Robinson Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Robinson's society, companionship, and counsel.

The Adrian Robles Family

984. Corporal Adrian Robles served in Afghanistan as a member of the U.S. Marine Corps. On October 22, 2008, Cpl Robles was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Cpl Robles died on October 22, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

985. Cpl Robles was a national of the United States at the time of the attack and his death.

986. Plaintiff Cesar Robles is the father of Cpl Robles. He is a national of the United States.

987. Plaintiff Yolanda Robles is the mother of Cpl Robles. She is a national of the United States.

988. As a result of the death of Cpl Robles, each member of the Robles Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Cpl Robles's society, companionship, and counsel.

The Mario Rodriguez Jr. Family

989. Sergeant Mario Rodriguez Jr. served in Afghanistan as a member of the U.S. Army. On June 11, 2010, SGT Rodriguez was injured in a complex attack involving small arms fire and rocket propelled grenades committed by the Haqqani Network, a part of the Taliban, in Logar Province, Afghanistan. SGT Rodriguez died on June 11, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

990. SGT Rodriguez was a national of the United States at the time of the attack and his death.

991. Plaintiff Leslie Rodriguez is the widow of SGT Rodriguez. She is a national of the United States.

992. Plaintiff R.G., by and through her next friend Leslie Rodriguez, is the minor step-daughter of SGT Rodriguez. She is a national of the United States. R.G. lived in the same household as SGT Rodriguez for a substantial period of time and considered SGT Rodriguez the functional equivalent of a biological father.

993. As a result of the death of SGT Rodriguez, each member of the Rodriguez Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Rodriguez's society, companionship, and counsel.

The Jason A. Rogers Family

994. Staff Sergeant Jason A. Rogers served in Afghanistan as a member of the U.S. Marine Corps. On April 7, 2011, SSgt Rogers was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSgt Rogers died on April 7, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

995. SSgt Rogers was a national of the United States at the time of the attack and his death.

996. Plaintiff Angela Rita Marie Rogers is the widow of SSgt Rogers. She is a national of the United States.

997. As a result of the death of SSgt Rogers, each member of the Rogers Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Rogers's society, companionship, and counsel.

The Matthew D. Roland Family

998. Captain Matthew D. Roland served in Afghanistan as a member of the U.S. Air Force. On August 26, 2015, Capt Roland was injured in an insider attack committed by the Taliban in Helmand Province, Afghanistan. Capt Roland died on August 26, 2015 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

999. Capt Roland was a national of the United States at the time of the attack and his death.

1000. Plaintiff Barbara A. Roland is the mother of Capt Roland. She is a national of the United States.

1001. Plaintiff Mark K. Roland is the father of Capt Roland. He is a national of the United States.

1002. Plaintiff Erica M. Roland is the sister of Capt Roland. She is a national of the United States.

1003. As a result of the death of Capt Roland, each member of the Roland Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Capt Roland's society, companionship, and counsel.

The Angel Roldan Jr. Family

1004. Angel Roldan Jr. served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On May 16, 2013, Mr. Roldan was injured in a suicide bombing attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Mr. Roldan died on May 16, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1005. Mr. Roldan was a national of the United States at the time of the attack and his death.

1006. Plaintiff Lieselotte R. Roldan is the widow of Mr. Roldan. She is a national of the United States.

1007. Plaintiff Angel R. Roldan is the son of Mr. Roldan. He is a national of the United States.

1008. Plaintiff Matthias P. Roldan is the son of Mr. Roldan. He is a national of the United States.

1009. Plaintiff Samantha G. Roldan is the daughter of Mr. Roldan. She is a national of the United States.

1010. As a result of the death of Mr. Roldan, each member of the Roldan Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Roldan's society, companionship, and counsel.

The Larry I. Rougle Family

1011. Staff Sergeant Larry I. Rougle served in Afghanistan as a member of the U.S. Army. On October 23, 2007, SSG Rougle was injured in an attack involving small arms fire committed by the Taliban in Kunar Province, Afghanistan. SSG Rougle died on October 23,

2007 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1012. SSG Rougle was a national of the United States at the time of the attack and his death.

1013. Plaintiff Ismael Rougle is the father of SSG Rougle. He is a national of the United States.

1014. Plaintiff Nancy Rougle is the mother of SSG Rougle. She is a national of the United States.

1015. As a result of the death of SSG Rougle, each member of the Rougle Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Rougle's society, companionship, and counsel.

The Nicholas R. Roush Family

1016. Corporal Nicholas R. Roush served in Afghanistan as a member of the U.S. Army. On August 16, 2009, CPL Roush was injured in an IED attack committed by the Taliban in Herat Province, Afghanistan. CPL Roush died on August 16, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1017. CPL Roush was a national of the United States at the time of the attack and his death.

1018. Plaintiff Donna Mae Roush is the mother of CPL Roush. She is a national of the United States.

1019. Plaintiff Robert Graham Roush Jr. is the father of CPL Roush. He is a national of the United States.

1020. As a result of the death of CPL Roush, each member of the Roush Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Roush's society, companionship, and counsel.

The Nicholas J. Rozanski Family

1021. Captain Nicholas J. Rozanski served in Afghanistan as a member of the U.S. Army National Guard. On April 4, 2012, CPT Rozanski was injured in a suicide bombing attack committed by the Taliban in Faryab Province, Afghanistan. CPT Rozanski died on April 4, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1022. CPT Rozanski was a national of the United States at the time of the attack and his death.

1023. Plaintiff Alex Jason Rozanski is the brother of CPT Rozanski. He is a national of the United States.

1024. As a result of the death of CPT Rozanski, each member of the Rozanski Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPT Rozanski's society, companionship, and counsel.

The Rex L. Schad Family

1025. Staff Sergeant Rex L. Schad served in Afghanistan as a member of the U.S. Army. On March 11, 2013, SSG Schad was injured in an insider attack committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Wardak Province, Afghanistan. SSG Schad died on March 11, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1026. SSG Schad was a national of the United States at the time of the attack and his death.

1027. Plaintiff Colleen Whipple is the mother of SSG Schad. She is a national of the United States.

1028. As a result of the death of SSG Schad, each member of the Schad Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Schad's society, companionship, and counsel.

The Jacob M. Schwallie Family

1029. Sergeant Jacob M. Schwallie served in Afghanistan as a member of the U.S. Army. On May 7, 2012, SGT Schwallie was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Ghazni Province, Afghanistan. SGT Schwallie died on May 7, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1030. SGT Schwallie was a national of the United States at the time of the attack and his death.

1031. Plaintiff Thomas Schwallie is the father of SGT Schwallie. He is a national of the United States.

1032. As a result of the death of SGT Schwallie, each member of the Schwallie Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Schwallie's society, companionship, and counsel.

The Derek L. Shanfield Family

1033. Sergeant Derek L. Shanfield served in Afghanistan as a member of the U.S. Marine Corps. On June 8, 2010, Sgt Shanfield was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. Sgt Shanfield died on June 8, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1034. Sgt Shanfield was a national of the United States at the time of the attack and his death.

1035. Plaintiff David Shanfield is the father of Sgt Shanfield. He is a national of the United States.

1036. Plaintiff Pamela Shanfield is the mother of Sgt Shanfield. She is a national of the United States.

1037. Plaintiff Sydney Shanfield is the brother of Sgt Shanfield. He is a national of the United States.

1038. As a result of the death of Sgt Shanfield, each member of the Shanfield Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Sgt Shanfield's society, companionship, and counsel.

The Charles Seth Sharp Family

1039. Lance Corporal Charles Seth Sharp served in Afghanistan as a member of the U.S. Marine Corps. On July 2, 2009, LCpl Sharp was injured in an attack involving small arms fire committed by the Taliban in Helmand Province, Afghanistan. LCpl Sharp died on July 2, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1040. LCpl Sharp was a national of the United States at the time of the attack and his death.

1041. Plaintiff Eric Sharp is the father of LCpl Sharp. He is a national of the United States.

1042. As a result of the death of LCpl Sharp, each member of the Sharp Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LCpl Sharp's society, companionship, and counsel.

The Amy R. Sinkler Family

1043. Private First Class Amy R. Sinkler served in Afghanistan as a member of the U.S. Army. On January 20, 2011, PFC Sinkler was injured in a rocket propelled grenade attack committed by the Taliban in Baghlan Province, Afghanistan. PFC Sinkler died on January 20, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1044. PFC Sinkler was a national of the United States at the time of the attack and her death.

1045. Plaintiff Jacqueline B. Thompson is the mother of PFC Sinkler. She is a national of the United States.

1046. Plaintiff Randolph D. Thompson is the father of PFC Sinkler. He is a national of the United States.

1047. Plaintiff Brittney Bullock is the sister of PFC Sinkler. She is a national of the United States.

1048. As a result of the death of PFC Sinkler, each member of the Sinkler Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Sinkler's society, companionship, and counsel.

The Wade A. Slack Family

1049. Specialist Wade A. Slack served in Afghanistan as a member of the U.S. Army. On May 6, 2010, SPC Slack was injured in an indirect fire attack committed by the Haqqani

Network, a part of the Taliban, in Wardak Province, Afghanistan. SPC Slack died on May 6, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1050. SPC Slack was a national of the United States at the time of the attack and his death.

1051. Plaintiff Andrew Slack is the brother of SPC Slack. He is a national of the United States.

1052. Plaintiff Jesse Slack is the brother of SPC Slack. He is a national of the United States.

1053. Plaintiff Jonathan H. Slack is the brother of SPC Slack. He is a national of the United States.

1054. Plaintiff Lauren Slack is the sister of SPC Slack. She is a national of the United States.

1055. Plaintiff Rose Ann Crossman is the step-mother of SPC Slack. She is a national of the United States. Rose Ann Crossman lived in the same household as SPC Slack for a substantial period of time and considered SPC Slack the functional equivalent of a biological son.

1056. Plaintiff Jessica Cook is the step-sister of SPC Slack. She is a national of the United States. Jessica Cook lived in the same household as SPC Slack for a substantial period of time and considered SPC Slack the functional equivalent of a biological brother.

1057. As a result of the death of SPC Slack, each member of the Slack Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Slack's society, companionship, and counsel.

The Edward Bernard Smith Family

1058. Staff Sergeant Edward Bernard Smith served in Afghanistan as a member of the U.S. Army. On September 24, 2009, SSG Smith was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Zabul Province, Afghanistan. SSG Smith died on September 24, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1059. SSG Smith was a national of the United States at the time of the attack and his death.

1060. Plaintiff Jamie Smith is the widow of SSG Smith. She is a national of the United States.

1061. Plaintiff Robert Earl Smith is the brother of SSG Smith. He is a national of the United States.

1062. Plaintiff Thelma Smith is the sister of SSG Smith. She is a national of the United States.

1063. Plaintiff Annette Parrish is the grandmother of SSG Smith. She is a national of the United States. Annette Parrish lived in the same household as SSG Smith for a substantial period of time and considered SSG Smith the functional equivalent of a biological son.

1064. Plaintiff DeAnndrea Luney is the step-daughter of SSG Smith. She is a national of the United States. DeAnndrea Luney lived in the same household as SSG Smith for a substantial period of time and considered SSG Smith the functional equivalent of a biological father.

1065. Plaintiff Deiontay Welch is the step-son of SSG Smith. He is a national of the United States. Deiontay Welch lived in the same household as SSG Smith for a substantial period of time and considered SSG Smith the functional equivalent of a biological father.

1066. As a result of the death of SSG Smith, each member of the Smith Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Smith's society, companionship, and counsel.

The Paul G. Smith Family

1067. Staff Sergeant Paul G. Smith served in Afghanistan as a member of the U.S. Army National Guard. On June 19, 2009, SSG Smith was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SSG Smith died on June 19, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1068. SSG Smith was a national of the United States at the time of the attack and his death.

1069. Plaintiff Kim Smith is the widow of SSG Smith. She is a national of the United States.

1070. Plaintiff Sarah Appenheimer is the daughter of SSG Smith. She is a national of the United States.

1071. Plaintiff Benjamin Smith is the son of SSG Smith. He is a national of the United States.

1072. As a result of the death of SSG Smith, each member of the Smith Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Smith's society, companionship, and counsel.

The Deangelo B. Snow Family

1073. Specialist Deangelo B. Snow served in Afghanistan as a member of the U.S. Army. On September 17, 2010, SPC Snow was injured in a rocket propelled grenade attack committed by the Taliban in Kandahar Province, Afghanistan. SPC Snow died on September 17, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1074. SPC Snow was a national of the United States at the time of the attack and his death.

1075. Plaintiff Deloris Snow is the mother of SPC Snow. She is a national of the United States.

1076. Plaintiff M.B., by and through her next friend Deloris Snow, is the minor sister of SPC Snow. She is a national of the United States.

1077. Plaintiff Damen Snow is the brother of SPC Snow. He is a national of the United States.

1078. As a result of the death of SPC Snow, each member of the Snow Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Snow's society, companionship, and counsel.

The Kristoffer M. Solesbee Family

1079. Technical Sergeant Kristoffer M. Solesbee served in Afghanistan as a member of the U.S. Air Force. On May 26, 2011, TSgt Solesbee was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. TSgt Solesbee died on May 26, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1080. TSgt Solesbee was a national of the United States at the time of the attack and his death.

1081. Plaintiff Larry Michael Solesbee is the father of TSgt Solesbee. He is a national of the United States.

1082. As a result of the death of TSgt Solesbee, each member of the Solesbee Family has experienced severe mental anguish, emotional pain and suffering, and the loss of TSgt Solesbee's society, companionship, and counsel.

The Jared W. Southworth Family

1083. First Lieutenant Jared W. Southworth served in Afghanistan as a member of the U.S. Army National Guard. On February 8, 2009, 1LT Southworth was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. 1LT Southworth died on February 8, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1084. 1LT Southworth was a national of the United States at the time of the attack and his death.

1085. Plaintiff Chrissy Prado is the widow of 1LT Southworth. She is a national of the United States.

1086. Plaintiff A.M.S., by and through her next friend Chrissy Prado, is the minor daughter of 1LT Southworth. She is a national of the United States.

1087. Plaintiff C.S.S., by and through her next friend Chrissy Prado, is the minor daughter of 1LT Southworth. She is a national of the United States.

1088. Plaintiff O.M.S., by and through his next friend Chrissy Prado, is the minor son of 1LT Southworth. He is a national of the United States.

1089. Plaintiff Logan M. Southworth is the son of 1LT Southworth. He is a national of the United States.

1090. Plaintiff Kimberly Southworth is the mother of 1LT Southworth. She is a national of the United States.

1091. Plaintiff Robert Southworth is the father of 1LT Southworth. He is a national of the United States.

1092. Plaintiff Christina Nikole Guerrero is the sister of 1LT Southworth. She is a national of the United States.

1093. Plaintiff Michael Southworth is the brother of 1LT Southworth. He is a national of the United States.

1094. As a result of the death of 1LT Southworth, each member of the Southworth Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1LT Southworth's society, companionship, and counsel.

The Orion N. Sparks Family

1095. Staff Sergeant Orion N. Sparks served in Afghanistan as a member of the U.S. Army. On September 26, 2012, SSG Sparks was injured in a suicide bombing attack committed by the Kabul Attack Network in Logar Province, Afghanistan. SSG Sparks died on September 26, 2012 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1096. SSG Sparks was a national of the United States at the time of the attack and his death.

1097. Plaintiff Garry Lee Sparks is the father of SSG Sparks. He is a national of the United States.

1098. Plaintiff Jan Marie Hurnblad Sparks is the mother of SSG Sparks. She is a national of the United States.

1099. Plaintiff Erik Sparks is the brother of SSG Sparks. He is a national of the United States.

1100. Plaintiff Zachary Douglas Sparks is the brother of SSG Sparks. He is a national of the United States.

1101. Plaintiff Jane Sparks is the step-mother of SSG Sparks. She is a national of the United States. Jane Sparks lived in the same household as SSG Sparks for a substantial period of time and considered SSG Sparks the functional equivalent of a biological son.

1102. As a result of the death of SSG Sparks, each member of the Sparks Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Sparks's society, companionship, and counsel.

The Tyler M. Springmann Family

1103. Private First Class Tyler M. Springmann served in Afghanistan as a member of the U.S. Army. On July 17, 2011, PFC Springmann was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. PFC Springmann died on July 17, 2011 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1104. PFC Springmann was a national of the United States at the time of the attack and his death.

1105. Plaintiff Tina Lynn Seekins is the mother of PFC Springmann. She is a national of the United States.

1106. As a result of the death of PFC Springmann, each member of the Springmann Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Springmann's society, companionship, and counsel.

The Brandon K. Steffey Family

1107. Specialist Brandon K. Steffey served in Afghanistan as a member of the U.S. Army. On October 25, 2009, SPC Steffey was injured in an IED attack committed by the Taliban in Laghman Province, Afghanistan. SPC Steffey died on October 25, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1108. SPC Steffey was a national of the United States at the time of the attack and his death.

1109. Plaintiff Rachel Humpf is the mother of SPC Steffey. She is a national of the United States.

1110. Plaintiff Dennis Steffey is the father of SPC Steffey. He is a national of the United States.

1111. Plaintiff David Humpf is the step-father of SPC Steffey. He is a national of the United States. David Humpf lived in the same household as SPC Steffey for a substantial period of time and considered SPC Steffey the functional equivalent of a biological son.

1112. As a result of the death of SPC Steffey, each member of the Steffey Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Steffey's society, companionship, and counsel.

The Jonnie L. Stiles Family

1113. Sergeant Jonnie L. Stiles served in Afghanistan as a member of the U.S. Army National Guard. In or about October 2008, SGT Stiles was injured in a terrorist attack. On

November 13, 2008, SGT Stiles was injured in an IED attack committed by the Taliban in Nangarhar Province, Afghanistan. SGT Stiles died on November 13, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1114. SGT Stiles was a national of the United States at the time of the attack and his death.

1115. Plaintiff Lynn Stiles is the father of SGT Stiles. He is a national of the United States.

1116. Plaintiff Kenneth J. Stiles is the brother of SGT Stiles. He is a national of the United States.

1117. Plaintiff Natalie Michelle Stiles is the sister of SGT Stiles. She is a national of the United States.

1118. Plaintiff Cecilia Stiles is the step-mother of SGT Stiles. She is a national of the United States. Cecilia Stiles lived in the same household as SGT Stiles for a substantial period of time and considered SGT Stiles the functional equivalent of a biological son.

1119. As a result of the death of SGT Stiles, each member of the Stiles Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Stiles's society, companionship, and counsel.

The Kyle Brandon Stout Family

1120. Sergeant Kyle Brandon Stout served in Afghanistan as a member of the U.S. Army. On July 30, 2010, SGT Stout was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. SGT Stout died on July 30, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1121. SGT Stout was a national of the United States at the time of the attack and his death.

1122. Plaintiff Billy Michael Stout is the father of SGT Stout. He is a national of the United States.

1123. Plaintiff Robin Stout is the mother of SGT Stout. She is a national of the United States.

1124. Plaintiff Melissa Stout is the sister of SGT Stout. She is a national of the United States.

1125. As a result of the death of SGT Stout, each member of the Stout Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Stout's society, companionship, and counsel.

The Joshua J. Strickland Family

1126. Sergeant Joshua J. Strickland served in Afghanistan as a member of the U.S. Army. On September 21, 2013, SGT Strickland was injured in an insider attack committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Paktia Province, Afghanistan. SGT Strickland died on September 21, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1127. SGT Strickland was a national of the United States at the time of the attack and his death.

1128. Plaintiff Garrett Layne Funk is the brother of SGT Strickland. He is a national of the United States.

1129. As a result of the death of SGT Strickland, each member of the Strickland Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Strickland's society, companionship, and counsel.

The Barry Sutton Family

1130. Barry Sutton served in Afghanistan as a civilian government contractor working for DynCorp, Int'l. On August 22, 2015, Mr. Sutton was injured in a suicide bombing attack committed by the Kabul Attack Network in Kabul Province, Afghanistan. Mr. Sutton died on August 22, 2015 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1131. Mr. Sutton was a national of the United States at the time of the attack and his death.

1132. Plaintiff Harriet Sutton is the mother of Mr. Sutton. She is a national of the United States.

1133. As a result of the death of Mr. Sutton, each member of the Sutton Family has experienced severe mental anguish, emotional pain and suffering, and the loss of Mr. Sutton's society, companionship, and counsel.

The Aaron J. Taylor Family

1134. Staff Sergeant Aaron J. Taylor served in Afghanistan as a member of the U.S. Marine Corps. On October 9, 2009, SSgt Taylor was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSgt Taylor died on October 9, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1135. SSgt Taylor was a national of the United States at the time of the attack and his death.

1136. Plaintiff Clifford Taylor is the father of SSgt Taylor. He is a national of the United States.

1137. As a result of the death of SSgt Taylor, each member of the Taylor Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSgt Taylor's society, companionship, and counsel.

The James E. Thode Family

1138. Sergeant First Class James E. Thode served in Afghanistan as a member of the U.S. Army National Guard. On December 2, 2010, SFC Thode was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Khost Province, Afghanistan. SFC Thode died on December 2, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1139. SFC Thode was a national of the United States at the time of the attack and his death.

1140. Plaintiff Evelyn Taylor is the mother of SFC Thode. She is a national of the United States.

1141. As a result of the death of SFC Thode, each member of the Thode Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SFC Thode's society, companionship, and counsel.

The Allen R. Thomas Family

1142. Staff Sergeant Allen R. Thomas served in Afghanistan as a member of the U.S. Army. On March 16, 2010, SSG Thomas was injured in a suicide bombing attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded SSG Thomas, who suffered from a traumatic brain injury with post-concussive syndrome, a restrictive ventilatory

defect, thoracic neuritis with chronic pain syndrome, post-traumatic stress disorder, left lateral thorax scars, and right back scars. The attack constituted an extrajudicial killing. As a result of the March 16, 2010 attack and his injuries, SSG Thomas has experienced severe physical and emotional pain and suffering. SSG Thomas died on September 29, 2013 as a result of injuries sustained during the attack.

1143. SSG Thomas was a national of the United States at the time of the attack and his death.

1144. Plaintiff Danica Thomas is the widow of SSG Thomas. She is a national of the United States.

1145. Plaintiff L.T., by and through her next friend Danica Thomas, is the minor daughter of SSG Thomas. She is a national of the United States.

1146. As a result of the March 16, 2010 attack and SSG Thomas's injuries and death, each member of the Thomas Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Thomas's society, companionship, and counsel.

The Jesse R. Tilton Family

1147. Sergeant Jesse R. Tilton served in Afghanistan as a member of the U.S. Army. On July 13, 2010, SGT Tilton was injured in a complex attack involving rocket propelled grenades and small-arms fire committed by the Taliban in Kandahar Province, Afghanistan. SGT Tilton died on July 16, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1148. SGT Tilton was a national of the United States at the time of the attack and his death.

1149. Plaintiff Julie Magana is the mother of SGT Tilton. She is a national of the United States.

1150. As a result of the death of SGT Tilton, each member of the Tilton Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SGT Tilton's society, companionship, and counsel.

The Ryan Gregory Timoney Family

1151. Plaintiff Captain Ryan Gregory Timoney served in Afghanistan as a member of the U.S. Army. On May 20, 2012, CPT Timoney was injured in a suicide bomber attack committed by the Taliban in Uruzgan Province, Afghanistan. The attack severely wounded CPT Timoney, who lost his left leg, suffered shrapnel injuries to his left arm, left chest, left abdomen, and left side of his skull, and also suffers from spinal pain, seizures, physical limitations, and speech, reading and vision difficulty. The attack constituted an extrajudicial killing. As a result of the May 20, 2012 attack and his injuries, CPT Timoney has experienced severe physical and emotional pain and suffering.

1152. CPT Timoney was a national of the United States at the time of the attack, and remains one to this day.

1153. Plaintiff Diane Timoney is the mother of CPT Timoney. She is a national of the United States.

1154. Plaintiff Gregory Timoney is the father of CPT Timoney. He is a national of the United States.

1155. As a result of the May 20, 2012 attack and CPT Timoney's injuries, each member of the Timoney Family has experienced severe mental anguish, emotional pain and suffering.

The Aaron C. Torian Family

1156. Master Sergeant Aaron C. Torian served in Afghanistan as a member of the U.S. Marine Corps. On February 15, 2014, MSgt Torian was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. MSgt Torian died on February 15, 2014 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1157. MSgt Torian was a national of the United States at the time of the attack and his death.

1158. Plaintiff Esta Smith is the mother of MSgt Torian. She is a national of the United States.

1159. Plaintiff Joe Torian is the father of MSgt Torian. He is a national of the United States.

1160. Plaintiff Emily Torian is the sister of MSgt Torian. She is a national of the United States.

1161. Plaintiff Nathan Ewell Torian is the brother of MSgt Torian. He is a national of the United States.

1162. Plaintiff Jimmy Smith is the step-father of MSgt Torian. He is a national of the United States. Jimmy Smith lived in the same household as MSgt Torian for a substantial period of time and considered MSgt Torian the functional equivalent of a biological son.

1163. As a result of the death of MSgt Torian, each member of the Torian Family has experienced severe mental anguish, emotional pain and suffering, and the loss of MSgt Torian's society, companionship, and counsel.

The Chad M. Trimble Family

1164. Private First Class Chad M. Trimble served in Afghanistan as a member of the U.S. Army. On May 28, 2008, PFC Trimble was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktia Province, Afghanistan. PFC Trimble died on May 28, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1165. PFC Trimble was a national of the United States at the time of the attack and his death.

1166. Plaintiff Nancy M. Trimble is the mother of PFC Trimble. She is a national of the United States.

1167. Plaintiff Timothy M. Trimble is the father of PFC Trimble. He is a national of the United States.

1168. As a result of the death of PFC Trimble, each member of the Trimble Family has experienced severe mental anguish, emotional pain and suffering, and the loss of PFC Trimble's society, companionship, and counsel.

Kevin Trimble

1169. Plaintiff Private First Class Kevin Trimble served in Afghanistan as a member of the U.S. Army. On September 17, 2012, PFC Trimble was injured in an IED attack committed by the Taliban in Kandahar Province, Afghanistan. The attack severely wounded PFC Trimble, who lost both legs above the knee, lost his left arm above the elbow, and also suffered from post-traumatic stress disorder and partial hearing loss. The attack constituted an extrajudicial killing. As a result of the September 17, 2012 attack and his injuries, PFC Trimble has experienced severe physical and emotional pain and suffering.

1170. PFC Trimble was a national of the United States at the time of the attack and remains one to this day.

The Estell L. Turner Family

1171. Specialist Estell L. Turner served in Afghanistan as a member of the U.S. Army. On June 28, 2008, SPC Turner was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Zabul Province, Afghanistan. SPC Turner died on July 2, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1172. SPC Turner was a national of the United States at the time of the attack and his death.

1173. Plaintiff Lyda Nieshe is the step-daughter of SPC Turner. She is a national of the United States. Lyda Nieshe lived in the same household as SPC Turner for a substantial period of time and considered SPC Turner the functional equivalent of a biological father.

1174. As a result of the death of SPC Turner, each member of the Turner Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Turner's society, companionship, and counsel.

The Jason A. Vazquez Family

1175. Staff Sergeant Jason A. Vazquez served in Afghanistan as a member of the U.S. Army National Guard. On September 17, 2008, SSG Vazquez was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Paktika Province, Afghanistan. SSG Vazquez died on September 17, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1176. SSG Vazquez was a national of the United States at the time of the attack and his death.

1177. Plaintiff Jose Anthony Vazquez is the father of SSG Vazquez. He is a national of the United States.

1178. Plaintiff Janice Vazquez is the sister of SSG Vazquez. She is a national of the United States.

1179. As a result of the death of SSG Vazquez, each member of the Vazquez Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Vazquez's society, companionship, and counsel.

Michael Verardo

1180. Plaintiff Sergeant Michael Verardo served in Afghanistan as a member of the U.S. Army. On April 24, 2010, SGT Verardo was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded SGT Verardo, who lost one leg and part of his left arm and suffered from significant burns, a traumatic brain injury, eardrum injury, and injuries to his face and airways. The attack constituted an extrajudicial killing. As a result of the April 24, 2010 attack and his injuries, SGT Verardo has experienced severe physical and emotional pain and suffering.

1181. SGT Verardo was a national of the United States at the time of the attack and remains one to this day.

Darryl Wallace

1182. Plaintiff Sergeant Darryl Wallace served in Afghanistan as a member of the U.S. Army. On June 9, 2007, SGT Wallace was injured in an IED attack committed by the Haqqani Network, a part of the Taliban, in Khost Province, Afghanistan. The attack severely wounded SGT Wallace, who lost both of his legs and suffered from crushed hips and pelvis, a broken lower back, a ruptured spleen, a broken left forearm requiring metal plates and over 100 screws,

crushed facial bones requiring reconstructive surgery, a traumatic brain injury, and post-traumatic stress disorder. The attack constituted an extrajudicial killing. As a result of the June 9, 2007 attack and his injuries, SGT Wallace has experienced severe physical and emotional pain and suffering.

1183. SGT Wallace was a national of the United States at the time of the attack and remains one to this day.

The Jonathan Michael Walls Family

1184. Corporal Jonathan Michael Walls served in Afghanistan as a member of the U.S. Army. On August 1, 2009, CPL Walls was injured in an attack involving an IED and rocket propelled grenades committed by the Taliban in Kandahar Province, Afghanistan. CPL Walls died on August 1, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1185. CPL Walls was a national of the United States at the time of the attack and his death.

1186. Plaintiff Steven Walls Sr. is the father of CPL Walls. He is a national of the United States.

1187. As a result of the death of CPL Walls, each member of the Walls Family has experienced severe mental anguish, emotional pain and suffering, and the loss of CPL Walls's society, companionship, and counsel.

The James J. Walton Family

1188. Lieutenant Colonel James J. Walton served in Afghanistan as a member of the U.S. Army. On June 21, 2008, LTC Walton was injured in a complex attack involving an IED and small arms fire committed by the Taliban in Kandahar Province, Afghanistan. LTC Walton

died on June 21, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1189. LTC Walton was a national of the United States at the time of the attack and his death.

1190. Plaintiff Sarah Moschler Walton is the widow of LTC Walton. She is a national of the United States.

1191. As a result of the death of LTC Walton, each member of the Walton Family has experienced severe mental anguish, emotional pain and suffering, and the loss of LTC Walton's society, companionship, and counsel.

The Nickolas S. Welch Family

1192. Specialist Nickolas S. Welch served in Afghanistan as a member of the U.S. Army. On July 23, 2013, SPC Welch was injured in an IED attack committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Wardak Province, Afghanistan. SPC Welch died on August 6, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1193. SPC Welch was a national of the United States at the time of the attack and his death.

1194. Plaintiff Barry Welch is the father of SPC Welch. He is a national of the United States.

1195. Plaintiff Lorria Welch is the mother of SPC Welch. She is a national of the United States.

1196. As a result of the death of SPC Welch, each member of the Welch Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SPC Welch's society, companionship, and counsel.

The Matthew J. West Family

1197. Staff Sergeant Matthew J. West served in Afghanistan as a member of the U.S. Army. On August 30, 2010, SSG West was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. SSG West died on August 30, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1198. SSG West was a national of the United States at the time of the attack and his death.

1199. Plaintiff John M. West is the father of SSG West. He is a national of the United States.

1200. Plaintiff Marcia M. West is the mother of SSG West. She is a national of the United States.

1201. Plaintiff Kristine Willis is the sister of SSG West. She is a national of the United States.

1202. As a result of the death of SSG West, each member of the West Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG West's society, companionship, and counsel.

The Leston M. Winters Family

1203. Staff Sergeant Leston M. Winters served in Afghanistan as a member of the U.S. Army. On July 15, 2010, SSG Winters was injured in an IED attack committed by the Taliban in

Kandahar Province, Afghanistan. SSG Winters died on July 15, 2010 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1204. SSG Winters was a national of the United States at the time of the attack and his death.

1205. Plaintiff Cheryl Spivey is the mother of SSG Winters. She is a national of the United States.

1206. Plaintiff Corbin Wayne Hunt is the brother of SSG Winters. He is a national of the United States.

1207. As a result of the death of SSG Winters, each member of the Winters Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Winters's society, companionship, and counsel.

The David T. Wright II Family

1208. First Lieutenant David T. Wright II served in Afghanistan as a member of the U.S. Army. On September 14, 2009, 1LT Wright was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. 1LT Wright died on September 14, 2009 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1209. 1LT Wright was a national of the United States at the time of the attack and his death.

1210. Plaintiff David Timothy Wright is the father of 1LT Wright. He is a national of the United States.

1211. Plaintiff Regina Michele Wright is the mother of 1LT Wright. She is a national of the United States.

1212. As a result of the death of 1LT Wright, each member of the Wright Family has experienced severe mental anguish, emotional pain and suffering, and the loss of 1LT Wright's society, companionship, and counsel.

The Randal P. Wright Family

1213. Lance Corporal Randal P. Wright served in Afghanistan as a member of the U.S. Marine Corps. On May 7, 2010, LCpl. Wright was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. The attack severely wounded LCpl. Wright, who lost both legs above the knee, lost his left hand, and also suffered from blown out ear drums, a traumatic brain injury, and numerous tissue and bone injuries. The attack constituted an extrajudicial killing. As a result of the May 7, 2010 attack and his injuries, LCpl. Wright has experienced severe physical and emotional pain and suffering. LCpl. Wright died on March 9, 2017 as a result of injuries sustained during the attack.

1214. LCpl. Wright was a national of the United States at the time of the attack and his death.

1215. Plaintiff F.S., by and through her next friend Ashley Rose Serocki, is the minor daughter of LCpl. Wright. She is a national of the United States.

1216. Plaintiff Dawn Marie Pattee is the mother of LCpl. Wright. She is a national of the United States.

1217. Plaintiff Jalisa Marie Hammond is the sister of LCpl. Wright. She is a national of the United States.

1218. Plaintiff Kristen Colleen Wright is the sister of LCpl. Wright. She is a national of the United States.

1219. As a result of the May 7, 2010 attack and LCpl. Wright's injuries and death, each member of the Wright Family has experienced severe mental anguish, emotional pain and suffering; and the loss of LCpl. Wright's society, companionship, and counsel.

The Mitchell W. Young Family

1220. Master Sergeant Mitchell W. Young served in Afghanistan as a member of the U.S. Army. On July 13, 2008, MSG Young was injured in an IED attack committed by the Taliban in Helmand Province, Afghanistan. MSG Young died on July 13, 2008 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1221. MSG Young was a national of the United States at the time of the attack and his death.

1222. Plaintiff Robyn Young is the widow of MSG Young. She is a national of the United States.

1223. As a result of the death of MSG Young, each member of the Young Family has experienced severe mental anguish, emotional pain and suffering, and the loss of MSG Young's society, companionship, and counsel.

The Sonny C. Zimmerman Family

1224. Staff Sergeant Sonny C. Zimmerman served in Afghanistan as a member of the U.S. Army. On July 16, 2013, SSG Zimmerman was injured in an attack involving a recoilless rifle committed by the Haqqani Network, a designated FTO at the time of the attack and part of the Taliban, in Paktia Province, Afghanistan. SSG Zimmerman died on July 16, 2013 as a result of injuries sustained during the attack. The attack constituted an extrajudicial killing.

1225. SSG Zimmerman was a national of the United States at the time of the attack and his death.

1226. Plaintiff Michelle Marie Fischbach is the mother of SSG Zimmerman. She is a national of the United States.

1227. Plaintiff Chris Lee Zimmerman is the father of SSG Zimmerman. He is a national of the United States.

1228. Plaintiff Baily Zimmerman is the sister of SSG Zimmerman. She is a national of the United States.

1229. As a result of the death of SSG Zimmerman, each member of the Zimmerman Family has experienced severe mental anguish, emotional pain and suffering, and the loss of SSG Zimmerman's society, companionship, and counsel.

CLAIM FOR RELIEF

COUNT ONE: PERSONAL INJURY OR DEATH UNDER 28 U.S.C. § 1605A(c)

1230. Plaintiffs incorporate the allegations above.

1231. Plaintiffs or their family members were killed or injured by acts of torture, extrajudicial killing, aircraft sabotage, hostage taking, or the provision of material support or resources for such acts, and such acts or provision of material support or resources were committed by officials, employees, or agents of Iran while acting within the scope of their office, employment, or agency.

1232. The terrorist attacks that killed or injured Plaintiffs or their family members occurred in Afghanistan.

1233. Iran was designated as a State Sponsor of Terrorism at the time of the terrorist acts that killed or injured Plaintiffs or their family members and remains so today.

1234. At the time of the attacks in which they or their family members were killed or injured, Plaintiffs or their attacked family members were U.S. nationals, members of the U.S.

armed forces, and/or employees or contractors of the U.S. government acting within the scope of their employment.

1235. Plaintiffs are currently nationals of the United States, members of the U.S. armed forces, employees or contractors of the United States government acting within the scope of their employment, or the legal representatives of one of the foregoing.

1236. Iran's conduct was criminal, outrageous, extreme, wanton, willful, malicious, and a threat to the public, warranting an award of punitive damages against Iran pursuant to 28 U.S.C. § 1605A(c).

1237. As a result of Defendant's liability under 28 U.S.C. § 1605A(c), Plaintiffs are entitled to recover compensatory damages, including, but not limited to, damages for their severe physical injuries, extreme mental anguish, pain and suffering, and solatium damages as determined by the trier of fact.

PRAYER FOR RELIEF

1238. Plaintiffs request that the Court:

- a. Enter judgment against Iran finding it liable under 28 U.S.C. § 1605A(c);
- b. Award Plaintiffs compensatory and punitive damages to the maximum extent permitted by law, 28 U.S.C. § 1605A(c);
- c. Award Plaintiffs prejudgment interest; and
- d. Award Plaintiffs any such further relief the Court deems just and proper.

Dated: December 27, 2019

Respectfully submitted,

/s/ Joshua D. Branson

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