

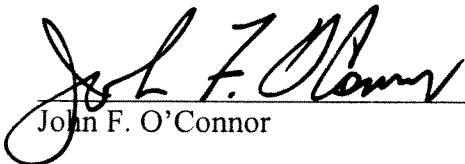
# **EXHIBIT B**



3. Attached hereto are true copies of the following documents:

Exhibit No.	Description
1	Email string with top email from Katherine Gallagher to Mohammed Alomari and others dated 12/26/12
2	Email string with top email from Susan Sajadi to redacted recipient and others dated 10/12/12
3	Email string with top email from Susan Burke to redacted recipient and others dated 10/14/12
4	Email string with top email from Susan Sajadi to redacted recipient dated 10/24/12
5	Email string with top email from Shereef Akeel to redacted recipient dated 12/6/12
6	Email dated 12/17/12 from J. William Koegel, Jr. to Susan Burke and Baher Azmy
7	Email string with top email from Sherref Akeel to Katherine Gallagher dated 12/18/12
8	Email string with top email from Shereef Akeel to redacted recipient dated 12/19/12
9	Email string with top email from Shereef Akeel to Baher Azmy and others dated 12/20/12
10	Email string with top email from Katherine Gallagher to Mohammed Alomari dated 12/30/12

4. Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true. Executed at Washington, D.C. this 22nd day of May, 2013.

  
 \_\_\_\_\_  
 John F. O'Connor

# **Exhibit 1**

**EXHIBIT FILED  
UNDER SEAL**

# **Exhibit 2**

## Katherine Gallagher

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**From:** Susan Sajadi <ssajadi@burkepllc.com>  
**Sent:** Friday, October 12, 2012 3:53 PM  
**To:** [REDACTED]  
**Cc:** Susan Burke; Katherine Gallagher; shereef@akeelvalentine.com; 'Mohammed Alomari'  
**Subject:** U.S. Visas for Al Shimari Plaintiffs  
**Attachments:** Iraqi Visa Information.pdf

[REDACTED]  
I hope you are well.

I'd like to touch base with you about visa applications for the four Al-Shimari plaintiffs (Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, Saád Hamza Hantoosh Al-Zuba'e and Salah Hasan Nusaif Jasim Al-Ejaili). The court in Virginia moves very, very quickly so we too will need to move quickly to secure U.S. visas for these four men. Are all four of them in Iraq? There are particular requirements for U.S. nonimmigrant visas for Iraqis. The type of visa they are applying for is a tourist visa, which is a **B-2 visa**. All answers to all forms must be in English with English characters. I've attached a form which describes the requirements and have also cut and paste the same below. **I've also included links to the 3 forms, below.** The forms ask for a significant amount of information and everything must be filled out accurately, truthfully and completely. Given the short timetables with which we are dealing, the applications for each of the men should be completed and submitted to the embassy by **October 22<sup>nd</sup>**.

Additionally, for the interviews, which will be scheduled by you after the applications are submitted, the men should take evidence that they will return to Iraq once the case is finished. This includes copies of their home lease, rental agreements, or deeds, pictures of their wives and children in Iraq, and evidence of their employment in Iraq. We will also send you additional information about the litigation so that they can take it to the embassy.

I appreciate your help, [REDACTED]. If you have any questions, please do not hesitate to contact me. We are relying on you to get these applications submitted with their photos, pay the visa fees, make the appointments for the interviews and make sure these men get to the interview. I'm happy to help you or to clarify any of the questions on the forms.

Thanks again,  
Susan

Here is the cut and paste of the information required, which is also attached.

An applicant who wishes to travel to the United States for business or pleasure, and intends to stay for only a limited period of time, should apply for a B-1 (Business) or B-2 (Tourism) visa.

A temporary visitor on a B-1 visa may come to the United States, for example, to consult with business associates, negotiate a contract, participate in a professional conference, or undertake independent research. On a B-2 visa, the visitor might go on a tour, visit friends and relatives, or receive medical treatment.

**All travelers, including children, require their own visa applications. All applicants between the ages of 14 and 80 require their own visa interview appointments.**

How to apply for a Visa

### 1. Complete the following application forms

- [Nonimmigrant Visa Application Form \(DS-160\)](#)  
\*This application form must be completed and submitted online.
- [Instructions for completing the DS-160 \(PDF 116 kb\)](#)
- [DS-158 \(PDF 297 kb\)](#)
- [Supplemental Nonimmigrant Visa Application DS-157 \(PDF 252 kb\)](#)

### 2. Pay the Visa application fee

- Take your passport or a copy of your passport to any Al Warka bank branch office and explain that you want to pay a U.S. visa fee. Please note that as of February 5, 2012, Bank of Baghdad will replace Al Warka bank as the official collector of U.S. visa application fees. You will be able to pay your fee at any Bank of Baghdad branch in Iraq. Any unused fee receipt from the Al Warka branch will still remain valid for one year from the date of purchase.
- It is permissible for another person to make the payment for you, but they must take your passport or a copy of your passport with them.
- Pay the \$160 fee. You will be issued a receipt. This fee change will formally go into effect on April 15, 2012.
- Verify that your receipt for payment includes:
  - (A) The visa applicant's name as it appears in her or his passport
  - (B) The visa applicant's passport number
  - (C) The words "US Embassy MRV Sweep"
  - (D) The payment must not be made more than 1 year before the visa interview

### 3. Schedule an Interview

- Please schedule an interview through the [Online Appointment System](#).
- Enter the confirmation code from your DS-160 confirmation page.
- Select an available appointment date from the calendar.
- Select a preferred time for your appointment, and then enter your Surname (last name), Given Name, Passport number, Email Address and Telephone Number.
- Verify that all the information entered is correct, and then click "Submit".
- Print the appointment confirmation page and bring it with you to your appointment.

### 4. Bring the following to your interview

- Completed application forms
- Original A, D, E, or G-series Iraqi Passport, valid for at least six (6) months after your date of travel
- Photocopy of the Biographical Data page of the passport
- Civil Identity card
- Click [here](#) for more information about photograph requirements. Photos must meet these requirements, or the application cannot be processed.
- \$160 Application fee, non-refundable and payable in the Consular Section at the time of the interview (U.S. cash only). This fee change will go into effect on April 15, 2012.
- One (1) photograph, taken within the last six months
- Pre-paid DHL Airway Bill ([For more information about using DHL](#))
- Documentation explaining the purpose of the trip, any arrangements to cover costs, and evidence of your ties to a residence outside of the United States. (\*Evidence of your ties to Iraq may include work contracts, bank statements, proof that you own property, letters of employment, and prior passports showing previous travel history.)



- If you are traveling to the U.S. on business, please provide a letter from your employer that explains the purpose of your trip, gives a detailed itinerary for your proposed length of stay, and indicates how the trip will be financed.

#### Processing Times for Applications:

Please schedule your visa appointment as far in advance of your travel dates as possible. Administrative processing of visa applications takes an average of six weeks.

NOTE: To qualify for a visa as a temporary visitor, you must prove that you are not intending to immigrate to the United States. According to Section 214(b) of U.S. Immigration law, you can prove this by demonstrating strong ties to a residence abroad that you do not intend to abandon. Ties may include your job, family, or house. For more information, click [here](#).

Attempting to obtain a visa by the willful misrepresentation of a material fact, or fraud, may result in the permanent refusal of a visa or denial of entry into the United State.

They should also collect other information, such as any leases they have or evidence that they live/work in Iraq and will return there. This includes pictures of their wives and children and evidence of their work. The American consulate is very careful in granting visas to individuals and they want to ensure that they will return to Iraq once the case is concluded.

Once the application is completed, you will need to go to the Bank of Baghdad. Please tell them that you want to pay the fee for the US visa application fee.

you will need to schedule an interview for the men at the embassy. For the interview, they will need to bring their confirmation page (indicating that the application was submitted) with their application ID number. They will also need to bring their passports. We will provide you with some other information for them to bring, as well.

# **Exhibit 3**

**EXHIBIT FILED  
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# **Exhibit 4**

**EXHIBIT FILED  
UNDER SEAL**

# **Exhibit 5**

**EXHIBIT FILED  
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# **Exhibit 6**



**O'Connor, John**

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**From:** Koegel, William  
**Sent:** Monday, December 17, 2012 3:09 PM  
**To:** sburke@burkepllc.com; Baher Azmy (BAzmy@ccrjustice.org)  
**Cc:** ssajadi@burkepllc.com; O'Connor, John  
**Subject:** Plaintiffs' Depositions

Susan/Baher:

When we met with Susan to discuss discovery in this action, Susan acknowledged that the Plaintiffs would appear for depositions in the Eastern District of Virginia. We'd like to schedule those. Please let us know each Plaintiff's availability for their deposition in January 2013. We will also let you know who we propose to use as a translator, as we understand that the Plaintiffs do not speak English. If there are any particular issues with dialect, please let us know so that we may prepare accordingly. Thanks - Bill

**William Koegel**  
Partner  
[WKoegel@step toe.com](mailto:WKoegel@step toe.com)

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# **Exhibit 7**

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# **Exhibit 8**

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# **Exhibit 9**

**EXHIBIT FILED  
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# **Exhibit 10**



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