

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

**ESTATE OF ADRIENNE ANNE  
NETA,**

By Nahar Neta, as Representative,

**ISRAEL NETA,**

**NAHAR NETA,**

**DROR NETA,**

**AYANA NETA,**

**CARMEL NETA,**

**CHEN ZEIGEN,**

**YONATAN ZEIGEN,**

**ESTATE OF ETAI COHEN,**

By Yaniv Yacov Cohen, as  
Representative,

**ORTAL PNINA COHEN,**

**YANIV YACOV COHEN,**

**N.C.,**

By Yaniv Yacov Cohen, as Next Friend,

**OFEK HANA COHEN,**

**JULIANA SHARONI,**

**ODED MENAHEM SHARONI,**

**E.S.,**

By Juliana Sharoni, as Next Friend,

**SUELI HERSZKOWICZ,**

**LUCIANA GANACH,**

**Civil Action No.:** \_\_\_\_\_

**TATIANA HERSZKOWICZ  
ERLICH,**

**ANITA SCHWADRON TREGER,**

**ROLAND ZEEV TREGER,**

**RAY COOPER,**

**ORA COOPER,**

**ZIONAH ALEXANDRA  
WINITZKY,**

**MICHAEL WINITZKY,**

**S.W.,**  
By Zionah Alexandra Winitzky, as Next  
Friend,

**E.W.,**  
By Zionah Alexandra Winitzky, as Next  
Friend,

**CARMI RUTH SPIWACK  
HOLTZER,**

**DAVID GARY HOLTZER,**

**NOAM GALIT EDRI,**

**ILAN YOSEF HOLTZER,**

**YONATAN MORDECHAI  
HOLTZER,**

**LOTAN RAANAN HOLTZER,**

**KFIR AVRAHAM EDRI,**

**R.E.,**  
By Noam Galit Edri, as Next Friend,

**A.E.,**  
By Noam Galit Edri, as Next Friend,

**M.E.,**

By Noam Galit Edri, as Next Friend,

**SHELLY PERELMANN HOLTZER,**

**Y.H.,**

By Ilan Yosef Holtzer, as Next Friend,

**L.H.,**

By Ilan Yosef Holtzer, as Next Friend,

**M.H.,**

By Ilan Yosef Holtzer, as Next Friend,

**NAOMI FAYE SANDERS,**

**OFER GELFAND,**

**DAVID JACOB SANDERS,**

**HILA SANDERS,**

**RACHEL ESTHER SANDERS,**

**YAIR BELLER,**

**ARNONA SHAPIRO-BELLER,**

**NOAM MENACHEM BELLER,**

**ISAAC BELLER,**

**YEHUDA SHMUEL BELLER,**

**HADASSA DEVORAH MALKA  
BELLER COHEN,**

**ASHIRA BELLER,**

**LIOR YOVEL BAR-OR,**

**ORIT DINA BAR-OR,**

**MARC LEON BRAWER,**

**ZOHAR TZLIL BAR-OR,**

**HILA MALKA BAR-OR,**

**MATAN ELIYAHU BOLTAX,**

**JONATHAN MARSHALL BOLTAX,**

**ARLYN BARRIE BOLTAX,**

**ELIORA YERUSHALAIM  
BOLTAX,**

**AMICHAH YISRAEL BOLTAX,**

**N.E.B.,**

By Johnathan Marshall Boltax, as Next  
Friend,

**N.T.T.B.,**

By Johnathan Marshall Boltax, as Next  
Friend,

**DAVID TUVIAL BROMBERG,**

**ISAAC SAMUEL BROMBERG,**

**RACHEL BROMBERG,**

**GAL BUKSPAN,**

**MERAV BUKSPAN,**

**RAN BUKSPAN,**

**LIOR BUKSPAN AMIR,**

**JONATHAN ALESANDRO  
DILLER,**

**DAVID ENGLANOFF,**

**SHIR LEVI,**

**SAMUEL ENGLANOFF,**

**MORDECHAI NISSIM  
ENGLANOFF,**

**DEBORAH ITZHAK,**

**SHLOMO ENGLANOFF,**

**LIRON MAZEH GABAY,**

**GIL GABAY,**

**OREL GABAY,**

**JANE VICTIM1 DOE,**

**JOHN FATHER DOE,**

**JANE MOTHER DOE,**

**JANE VICTIM2 DOE,**

**GILAD KARPLUS,**

**OMRY KARPLUS,**

**JANE VICTIM ADOE**

**JOHN FATHER ADOE,**

**JANE MOTHER ADOE,**

**JOHN BROTHER1 ADOE,**

**JOHN BROTHER2 ADOE,**

**ORI LEVY,**

**OREN LEVY,**

**ORTAL LEVY,**

**NADIR LEVY,**

**CARMEL MEDALIA,**

**JANE VICTIM BDOE,**

**JOHN FATHER BDOE,**

**JANE MOTHER BDOE,**

**JANE SISTER1 BDOE,**

By John Father BDoe, as Next Friend,

**JANE SISTER2 BDOE,**

By John Father BDoe, as Next Friend,

**AVIV OZ,**

**ROXANNE NINA ELLIOTT,**

**MOSHE OZ,**

**NAVA OZ,**

**YANIV OZ,**

**GIL YOSEF OZ,**

**HADAR OZ,**

**GAL PORAT,**

**OFER PORAT,**

**ANAT PORAT,**

**RON ESTHER PORAT,**

**RAZ PORAT,**

**ELLA SCHECHTER SEGEV,**

**MAYA SHAHAM,**

**GUY SHAHAM,**

**STACY MARLA SHAHAM,**

**AVIV SHAHAM,**

**OREN SHAHAM,**

**OFIR TAL,**

**SHELLEY SHARON  
WEISBERGER,**

**BELLA WEISBERGER,**

**KEITH STEWART WEISBERGER,**

**JOHN VICTIM CDOE,**  
By John Father CDoe, as  
Representative,

**JOHN FATHER CDOE,**

**JANE MOTHER CDOE,**

**JANE SISTER1 CDOE,**

**JANE SISTER2 CDOE,**

**Plaintiffs,**

**v.**

**ISLAMIC REPUBLIC OF IRAN,**  
Tehran, IRAN,

**SYRIAN ARAB REPUBLIC,**  
Damascus, SYRIA,

**DEMOCRATIC PEOPLE'S  
REPUBLIC OF KOREA,**  
Pyongyang, NORTH KOREA,

**Defendants.**

## **COMPLAINT**

1. At daybreak on Saturday, October 7, 2023, thousands of Hamas-led terrorists swarmed into Israeli communities near the Israel-Gaza border and brutally massacred and terrorized innocent men, women, and children in their wake (the “October 7 Attack” or the “Attack”). The October 7 Attack was the deadliest attack on Jews since the Holocaust, though

Hamas's terrorist rampage killed, injured, and terrorized Jews and non-Jews alike. Victims of the onslaught included Israelis (both Jews and Arabs), dual nationals (including many American citizens), foreign workers, people simply visiting their families for the Jewish *Sukkot* and *Simchat Torah* holidays, and mostly young people attending a concert celebrating peace and love. It was a terrorist attack of pure and indiscriminate brutality.

2. First, terrorists launched thousands of rockets, missiles, and armed drones into Israel. Some of these specifically targeted Israeli guard posts and surveillance, communication, and other security and defensive systems to pave the way for an all-out attack. Next, droves of armed terrorists breached the security fence separating Gaza from Israel in dozens of locations, allowing for attackers to infiltrate on motorcycles and in trucks. Some terrorists also paraglided into Israel, while others stormed Israeli beaches on motorboats. The terrorists then went on a barbaric rampage, murdering and injuring innocent victims – men, women, the elderly, teenagers, toddlers, and babies – on the streets and in their cars, homes, and wherever else they could be found. The unfathomable atrocities the terrorists committed as part of their massacre included rape, mutilation, decapitation, torture, and burning human beings alive, including full families huddled together in their final, terrifying moments. The terrorists ripped hostages from their homes, places of work, and wherever else they could be found, including hiding in places such as “safe rooms” or bomb shelters, killing some and holding others as leverage, bargaining chips, and human shields. The terrorists continue to this day to hold 116 hostages from the October 7 Attack – innocent people who were stolen from their families and their lives. It is unknown if they are dead or alive, or what brutal torture the terrorists have wreaked upon them.

3. In a horrifying scene of vicious dichotomy, the murderous terrorists stormed through the Nova Music Festival – an open-air festival celebrating music, love, and unity –



hunting down and indiscriminately murdering over 350 innocent celebrants, and injuring and terrorizing thousands, mostly young people. The festival was advertised as “one of the biggest, most influential, and revered festivals in the world,” taking place “for the very first time in Israel.” The festival was designed to bring together a “massive community, which has been built over 23 years, inspiring people globally across continents,” and promoting “a set of fundamental and important human values,” including “free love and spirit, environmental preservation, [and] appreciation of rare natural values.” Those who miraculously survived the onslaught bear the permanent scars of the horrors they experienced, and the friends and family they lost.

4. The terrorists were not an independent band of marauders. They were organized death squads deployed by their terrorist organizations, and supported, funded, and supplied by their terrorist-sponsoring countries, who have consistently supported and sponsored terrorist attacks on Americans and their allies, including in Israel, and continue to do so today.

5. Plaintiffs in this case are the estates of individuals who were injured and/or killed in the October 7 Attack, individuals who were physically and/or emotionally injured in the Attack, and immediate family members of individuals who were injured and/or killed in the Attack.

6. Plaintiffs, by and through their undersigned counsel, bring this action against Defendants the Islamic Republic of Iran (“Iran”), the Syrian Arab Republic (“Syria”), and the Democratic People’s Republic of Korea (“North Korea,” and, collectively with Iran and Syria, “Defendants”) seeking money damages for their personal injury and/or wrongful death claims arising out of the October 7 Attack – a coordination of extrajudicial killings, hostage takings, and related horrors for which the Defendants provided material support and resources. In support of their claims, Plaintiffs allege the following:

## **JURISDICTION AND VENUE**

7. This Court has jurisdiction over the subject matter of this case under 28 U.S.C. § 1330(a). Defendants are subject to suit in the courts of the United States pursuant to the Foreign Sovereign Immunities Act (“FSIA”), 28 U.S.C. § 1602 et seq., and in particular 28 U.S.C. § 1605A (the “Terrorism Exception”), and related statutes.

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391(f)(4).

## **THE PARTIES**

### **PLAINTIFFS**

9. Plaintiffs are U.S. citizens who were injured and/or killed as a result of the October 7 Attack, and/or the immediate family members of those injured and/or killed.

#### **A. Neta Family**

10. Adrienne Anne Neta (a.k.a. Adrienne Anne Lampard), now deceased, was murdered in the October 7 Attack, after suffering severe physical and emotional injury as a result of the Attack. At the time of the acts alleged herein, Adrienne Anne Neta was a U.S. citizen. Adrienne Anne Neta was killed by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the Torture Victims Protection Act (“TVPA”), 28 U.S.C. 1350 note, in connection with the October 7 Attack. Adrienne Anne Neta’s estate is governed by the laws of Israel. The Estate of Adrienne Anne Neta is represented by Nahar Neta for purposes of this lawsuit. Nahar Neta is a U.S. citizen. Nahar Neta, on behalf of the Estate of Adrienne Anne Neta, brings claims for wrongful death, personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

11. Israel Neta is the husband of Adrienne Anne Neta, who was killed as a result of the October 7 Attack. Israel Neta is an Israeli citizen. Israel Neta brings claims for personal

injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

12. Nahar Neta is the son of Adrienne Anne Neta, who was killed as a result of the October 7 Attack. Nahar Neta is a U.S. citizen. Nahar Neta brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

13. Dror Neta is the daughter of Adrienne Anne Neta, who was killed as a result of the October 7 Attack. Dror Neta is a U.S. citizen. Dror Neta brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

14. Ayana Neta is the daughter of Adrienne Anne Neta, who was killed as a result of the October 7 Attack. Ayana Neta is a U.S. citizen. Ayana Neta brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

15. Carmel Neta is the son of Adrienne Anne Neta, who was killed as a result of the October 7 Attack. Carmel Neta is a U.S. citizen. Carmel Neta brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**B. Silver/Zeigen Family**

16. Vivian Silver was murdered in the October 7 Attack, after suffering severe physical and emotional injury as a result of the attack. At the time of the acts alleged herein, Vivian Silver was an Israeli citizen. Vivian Silver was killed by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

17. Chen Zeigen is the son of Vivian Silver, who was killed as a result of the October 7 Attack. Chen Zeigen is a U.S. citizen. Chen Zeigen brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

18. Yonatan Zeigen is the son of Vivian Silver, who was killed as a result of the October 7 Attack. Yonatan Zeigen is a U.S. citizen. Yonatan Zeigen brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**C. Cohen Family**

19. Etai Cohen, now deceased, was murdered in the October 7 Attack, after suffering severe physical and emotional injury as a result of the attack. At the time of the acts alleged herein, Etai Cohen was a U.S. citizen. Etai Cohen was killed by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Etai Cohen’s estate is governed by the laws of Israel. The Estate of Etai Cohen is represented by Yaniv Yacov Cohen for purposes of this lawsuit. Yaniv Yacov Cohen, on behalf of the Estate of Etai Cohen, brings claims for wrongful death, personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

20. Ortal Pnina Cohen (a.k.a. Ortal Pnina Katz) is the mother of Etai Cohen, a U.S. citizen, who was killed as a result of the October 7 Attack. Ortal Pnina Cohen is a U.S. citizen. Ortal Pnina Cohen brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

21. Yaniv Yacov Cohen is the father of Etai Cohen, a U.S. citizen, who was killed as a result of the October 7 Attack. Yaniv Yacov Cohen is an Israeli citizen. Yaniv Yacov Cohen

brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

22. N.C. is the brother of Etai Cohen, who was killed as a result of the October 7 Attack. N.C. is a U.S. citizen. N.C., a minor child, is represented by Yaniv Yacov Cohen as Next Friend for purposes of this lawsuit. Yaniv Yacov Cohen, on behalf of N.C., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

23. Ofek Hana Cohen is the sister of Etai Cohen, who was killed as a result of the October 7 Attack. Ofek Hana Cohen is a U.S. citizen. Ofek Hana Cohen brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**D. Sharoni/Herszkowicz (Juliana) Family**

24. Juliana Sharoni (a.k.a. Juliana Hershkoviz Johnson) was a victim of the October 7 Attack. At the time of the acts alleged herein, Juliana Sharoni was a U.S. citizen. Juliana Sharoni was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Juliana Sharoni brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

25. Oded Menahem Sharoni is the husband of Juliana Sharoni, a U.S. citizen, who was injured as a result of the October 7 Attack. Oded Menahem Sharoni is an Israeli citizen. Oded Menahem Sharoni brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

26. E.S. is the daughter of Juliana Sharoni, who was injured as a result of the October 7 Attack. E.S. is a U.S. citizen. E.S., a minor child, is represented by Juliana Sharoni as Next

Friend for purposes of this lawsuit. Juliana Sharoni, on behalf of E.S., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

27. Sueli Herszkowicz is the mother of Juliana Sharoni, a U.S. citizen, who was injured as a result of the October 7 Attack. Sueli Herszkowicz is an Israeli citizen. Sueli Herszkowicz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

28. Luciana Ganach is the sister of Juliana Sharoni, who was injured as a result of the October 7 Attack. Luciana Ganach is a U.S. citizen. Luciana Ganach brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

29. Tatiana Herszkowicz Erlich is the sister of Juliana Sharoni, a U.S. citizen, who was injured as a result of the October 7 Attack. Tatiana Herszkowicz Erlich is an Israeli citizen. Tatiana Herszkowicz Erlich brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**E. Sharoni/Herszkowicz (E.S.) Family**

30. E.S. was a victim of the October 7 Attack. At the time of the acts alleged herein, E.S. was a U.S. citizen. E.S. was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. E.S., a minor child, is represented by Juliana Sharoni as Next Friend for purposes of this lawsuit. Juliana Sharoni, on behalf of E.S., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

31. Juliana Sharoni is the mother of E.S., who was injured as a result of the October 7 Attack. Juliana Sharoni is a U.S. citizen. Juliana Sharoni brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

32. Oded Menahem Sharoni is the father of E.S., a U.S. citizen, who was injured as a result of the October 7 Attack. Oded Menahem Sharoni is an Israeli citizen. Oded Menahem Sharoni brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**F. Sharoni/Herszkowicz (Sueli) Family**

33. Sueli Herszkowicz was a victim of the October 7 Attack. At the time of the acts alleged herein, Sueli Herszkowicz was an Israeli citizen. Sueli Herszkowicz was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

34. Juliana Sharoni is the daughter of Sueli Herszkowicz, who was injured as a result of the October 7 Attack. Juliana Sharoni is a U.S. citizen. Juliana Sharoni brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

35. Luciana Ganach is the daughter of Sueli Herszkowicz, who was injured as a result of the October 7 Attack. Luciana Ganach is a U.S. citizen. Luciana Ganach brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**G. Treger Family**

36. Maya Treger Rosenfeld was a victim of the October 7 Attack. At the time of the acts alleged herein, Maya Treger Rosenfeld was a U.S. citizen. Maya Treger Rosenfeld was

injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

37. Anita Schwadron Treger is the mother of Maya Treger Rosenfeld, a U.S. citizen, who was injured as a result of the October 7 Attack. Anita Schwadron Treger is a U.S. citizen. Anita Schwadron Treger brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

38. Roland Zeev Treger is the father of Maya Treger Rosenfeld, a U.S. citizen, who was injured as a result of the October 7 Attack. Roland Zeev Treger is an Israeli citizen. Roland Zeev Treger brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**H. Cooper (Amiram) Family**

39. Amiram Cooper, now deceased, was a victim of the October 7 Attack. Amiram Cooper was injured and taken hostage in the Attack, and was later killed in Hamas captivity as a result of the Attack. At the time of the acts alleged herein, Amiram Cooper was an Israeli citizen. Amiram Cooper was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

40. Ray Cooper (a.k.a. Rotem Cooper) is the son of Amiram Cooper, who was injured, taken hostage, and then killed, as a result of the October 7 Attack. Ray Cooper is a U.S. citizen. Ray Cooper brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

41. Ora Cooper is the sister of Amiram Cooper, who was injured, taken hostage, and then killed, as a result of the October 7 Attack. Ora Cooper is a U.S. citizen. Ora Cooper brings



claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**I. Cooper (Nurit) Family**

42. Nurit Cooper was a victim of the October 7 Attack. Nurit Cooper was injured and taken hostage as a result of the October 7 Attack. At the time of the acts alleged herein, Nurit Cooper was an Israeli citizen. Nurit Cooper was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

43. Ray Cooper (a.k.a. Rotem Cooper) is the son of Nurit Cooper, who was injured and taken hostage as a result of the October 7 Attack. Ray Cooper is a U.S. citizen. Ray Cooper brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**J. Holtzer/Winitzky (Zionah) Family**

44. Zionah Alexandra Winitzky (a.k.a. Zionah Alexandra Holtzer) was a victim of the October 7 Attack. At the time of the acts alleged herein, Zionah Alexandra Winitzky was a U.S. citizen. Zionah Alexandra Winitzky was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Zionah Alexandra Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

45. Michael Winitzky is the husband of Zionah Alexandra Winitzky, a U.S. citizen, who was injured as a result of the October 7 Attack. Michael Winitzky is an Israeli citizen. Michael Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

46. S.W. is the son of Zionah Alexandra Winitzky, a U.S. citizen, who was injured as a result of the October 7 Attack. S.W. is an Israeli citizen. S.W., a minor child, is represented by Zionah Alexandra Winitzky as Next Friend for purposes of this lawsuit. Zionah Alexandra Winitzky, on behalf of S.W., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

47. E.W. is the son of Zionah Alexandra Winitzky, a U.S. citizen, who was injured as a result of the October 7 Attack. E.W. is an Israeli citizen. E.W., a minor child, is represented by Zionah Alexandra Winitzky as Next Friend for purposes of this lawsuit. Zionah Alexandra Winitzky, on behalf of E.W., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

48. Carmi Ruth Spiwack Holtzer is the mother of Zionah Alexandra Winitzky, who was injured as a result of the October 7 Attack. Carmi Ruth Spiwack Holtzer is a U.S. citizen. Carmi Ruth Spiwack Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

49. David Gary Holtzer is the father of Zionah Alexandra Winitzky, who was injured as a result of the October 7 Attack. David Gary Holtzer is a U.S. citizen. David Gary Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

50. Noam Galit Edri (a.k.a. Noam Galit Holtzer) is the sister of Zionah Alexandra Winitzky, who was injured as a result of the October 7 Attack. Noam Galit Edri is a U.S. citizen. Noam Galit Edri brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

51. Ilan Yosef Holtzer is the brother of Zionah Alexandra Winitzky, who was injured as a result of the October 7 Attack. Ilan Yosef Holtzer is a U.S. citizen. Ilan Yosef Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

52. Yonatan Mordechai Holtzer is the brother of Zionah Alexandra Winitzky, who was injured as a result of the October 7 Attack. Yonatan Mordechai Holtzer is a U.S. citizen. Yonatan Mordechai Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

53. Lotan Raanan Holtzer is the brother of Zionah Alexandra Winitzky, who was injured as a result of the October 7 Attack. Lotan Raanan Holtzer is a U.S. citizen. Lotan Raanan Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**K. Winitzky (Michael) Family**

54. Michael Winitzky was a victim of the October 7 Attack. At the time of the acts alleged herein, Michael Winitzky was an Israeli citizen. Michael Winitzky was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

55. Zionah Alexandra Winitzky is the wife of Michael Winitzky, who was injured as a result of the October 7 Attack. Zionah Alexandra Winitzky is a U.S. citizen. Zionah Alexandra Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**L. Winitzky (S.W.) Family**

56. S.W. was a victim of the October 7 Attack. At the time of the acts alleged herein, S.W. was an Israeli citizen. S.W. was injured by an act of “torture, extrajudicial killing, . . . [or]

hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

57. Zionah Alexandra Winitzky is the mother of S.W., who was injured as a result of the October 7 Attack. Zionah Alexandra Winitzky is a U.S. citizen. Zionah Alexandra Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**M. Holtzer/Winitzky (David) Family**

58. David Gary Holtzer was a victim of the October 7 Attack. At the time of the acts alleged herein, David Gary Holtzer was a U.S. citizen. David Gary Holtzer was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. David Gary Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

59. Carmi Ruth Spiwack Holtzer is the wife of David Gary Holtzer, who was injured as a result of the October 7 Attack. Carmi Ruth Spiwack Holtzer is a U.S. citizen. Carmi Ruth Spiwack Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

60. Zionah Alexandra Winitzky (a.k.a. Zionah Alexandra Holtzer) is the daughter of David Gary Holtzer, who was injured as a result of the October 7 Attack. Zionah Alexandra Winitzky is a U.S. citizen. Zionah Alexandra Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

61. Noam Galit Edri is the daughter of David Gary Holtzer, who was injured as a result of the October 7 Attack. Noam Galit Edri is a U.S. citizen. Noam Galit Edri brings claims

for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

62. Ilan Yosef Holtzer is the son of David Gary Holtzer, who was injured as a result of the October 7 Attack. Ilan Yosef Holtzer is a U.S. citizen. Ilan Yosef Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

63. Yonatan Mordechai Holtzer is the son of David Gary Holtzer, who was injured as a result of the October 7 Attack. Yonatan Mordechai Holtzer is a U.S. citizen. Yonatan Mordechai Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

64. Lotan Raanan Holtzer is the son of David Gary Holtzer, who was injured as a result of the October 7 Attack. Lotan Raanan Holtzer is a U.S. citizen. Lotan Raanan Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**N. Edri/Holtzer (Noam) Family**

65. Noam Galit Edri was a victim of the October 7 Attack. At the time of the acts alleged herein, Noam Galit Edri was a U.S. citizen. Noam Galit Edri was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Noam Galit Edri brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

66. Kfir Avraham Edri is the husband of Noam Galit Edri, a U.S. citizen, who was injured as a result of the October 7 Attack. Kfir Avraham Edri is an Israeli citizen. Kfir Avraham

Edri brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

67. R.E. is the son of Noam Galit Edri, a U.S. citizen, who was injured as a result of the October 7 Attack. R.E. is an Israeli citizen. R.E., a minor child, is represented by Noam Galit Edri as Next Friend for purposes of this lawsuit. Noam Galit Edri, on behalf of R.E., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

68. A.E. is the son of Noam Galit Edri, a U.S. citizen, who was injured as a result of the October 7 Attack. A.E. is an Israeli citizen. A.E., a minor child, is represented by Noam Galit Edri as Next Friend for purposes of this lawsuit. Noam Galit Edri, on behalf of A.E., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

69. M.E. is the daughter of Noam Galit Edri, a U.S. citizen, who was injured as a result of the October 7 Attack. M.E. is an Israeli citizen. M.E., a minor child, is represented by Noam Galit Edri as Next Friend for purposes of this lawsuit. Noam Galit Edri, on behalf of M.E., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

70. David Gary Holtzer is the father of Noam Galit Edri, who was injured as a result of the October 7 Attack. David Gary Holtzer is a U.S. citizen. David Gary Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

71. Carmi Ruth Spiwack Holtzer is the mother of Noam Galit Edri, who was injured as a result of the October 7 Attack. Carmi Ruth Spiwack Holtzer is a U.S. citizen. Carmi Ruth

Spiwack Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

72. Zionah Alexandra Winitzky is the sister of Noam Galit Edri, who was injured as a result of the October 7 Attack. Zionah Alexandra Winitzky is a U.S. citizen. Zionah Alexandra Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

73. Ilan Yosef Holtzer is the brother of Noam Galit Edri, who was injured as a result of the October 7 Attack. Ilan Yosef is a U.S. citizen. Ilan Yosef brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

74. Yonatan Mordechai Holtzer is the brother of Noam Galit Edri, who was injured as a result of the October 7 Attack. Yonatan Mordechai Holtzer is a U.S. citizen. Yonatan Mordechai Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

75. Lotan Raanan Holtzer is the brother of Noam Galit Edri, who was injured as a result of the October 7 Attack. Lotan Raanan Holtzer is a U.S. citizen. Lotan Raanan Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**O. Edri (R.E.) Family**

76. R.E. was a victim of the October 7 Attack. At the time of the acts alleged herein, R.E. was an Israeli citizen. R.E. was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

77. Noam Galit Edri is the mother of R.E., who was injured as a result of the October 7 Attack. Noam Galit Edri is a U.S. citizen. Noam Galit Edri brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**P. Holtzer (Ilan) Family**

78. Ilan Yosef Holtzer was a victim of the October 7 Attack. At the time of the acts alleged herein, Ilan Yosef Holtzer was a U.S. citizen. Ilan Yosef Holtzer was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Ilan Yosef Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

79. Shelly Perelmann Holtzer is the wife of Ilan Yosef Holtzer, a U.S. citizen, who was injured as a result of the October 7 Attack. Shelly Perelmann Holtzer is an Israeli citizen. Shelly Perelmann Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

80. Y.H. is the son of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. Y.H. is a U.S. citizen. Y.H., a minor child, is represented by Ilan Yosef Holtzer as Next Friend for purposes of this lawsuit. Ilan Yosef Holtzer, on behalf of Y.H., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

81. L.H. is the daughter of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. L.H. is a U.S. citizen. L.H., a minor child, is represented by Ilan Yosef Holtzer as Next Friend for purposes of this lawsuit. Ilan Yosef Holtzer, on behalf of L.H., brings claims



for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

82. M.H. is the daughter of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. M.H. is a U.S. citizen. M.H., a minor child, is represented by Ilan Yosef Holtzer as Next Friend for purposes of this lawsuit. Ilan Yosef Holtzer, on behalf of M.H., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

83. David Gary Holtzer is the father of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. David Gary Holtzer is a U.S. citizen. David Gary Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

84. Carmi Ruth Spiwack Holtzer is the mother of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. Carmi Ruth Spiwack Holtzer is a U.S. citizen. Carmi Ruth Spiwack Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

85. Zionah Alexandra Winitzky is the sister of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. Zionah Alexandra Winitzky is a U.S. citizen. Zionah Alexandra Winitzky brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

86. Noam Galit Edri is the sister of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. Noam Galit Edri is a U.S. citizen. Noam Galit Edri brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

87. Yonatan Mordechai Holtzer is the brother of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. Yonatan Mordechai Holtzer is a U.S. citizen. Yonatan Mordechai Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

88. Lotan Raanan Holtzer is the brother of Ilan Yosef Holtzer, who was injured as a result of the October 7 Attack. Lotan Raanan Holtzer is a U.S. citizen. Lotan Raanan Holtzer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**Q. Gelfand/Sanders (Naomi) Family**

89. Naomi Faye Sanders was a victim of the October 7 Attack. At the time of the acts alleged herein, Naomi Faye Sanders was a U.S. citizen. Naomi Faye Sanders was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Naomi Faye Sanders brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

90. Ofer Gelfand is the husband of Naomi Faye Sanders, a U.S. citizen, who was injured as a result of the October 7 Attack. Ofer Gelfand is an Israeli citizen. Ofer Gelfand brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

91. David Jacob Sanders is the father of Naomi Faye Sanders, who was injured as a result of the October 7 Attack. David Jacob Sanders is a U.S. citizen. David Jacob Sanders brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

92. Hila Sanders (a.k.a. Hila Segev) is the mother of Naomi Faye Sanders, who was injured as a result of the October 7 Attack. Hila Sanders is a U.S. citizen. Hila Sanders brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

93. Rachel Esther Sanders is the sister of Naomi Faye Sanders, who was injured as a result of the October 7 Attack. Rachel Esther Sanders is a U.S. citizen. Rachel Esther Sanders brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**R. Sanders/Gelfand (Ofer) Family**

94. Ofer Gelfand was a victim of the October 7 Attack. At the time of the acts alleged herein, Ofer Gelfand was an Israeli citizen. Ofer Gelfand was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

95. Naomi Faye Sanders is the wife of Ofer Gelfand, who was injured as a result of the October 7 Attack. Naomi Faye Sanders is a U.S. citizen. Naomi Faye Sanders brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**S. Beller Family**

96. Yair Beller was a victim of the October 7 Attack. At the time of the acts alleged herein, Yair Beller was a U.S. citizen. Yair Beller was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Yair Beller brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

97. Arnona Shapiro-Beller is the mother of Yair Beller, who was injured as a result of the October 7 Attack. Arnona Shapiro-Beller is a U.S. citizen. Arnona Shapiro-Beller brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

98. Noam Menachem Beller is the brother of Yair Beller, who was injured as a result of the October 7 Attack. Noam Menachem Beller is a U.S. citizen. Noam Menachem Beller brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

99. Isaac Beller (a.k.a. Yitzchak Beller) is the brother of Yair Beller, who was injured as a result of the October 7 Attack. Isaac Beller is a U.S. citizen. Isaac Beller brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

100. Yehuda Shmuel Beller is the brother of Yair Beller, who was injured as a result of the October 7 Attack. Yehuda Shmuel Beller is a U.S. citizen. Yehuda Shmuel Beller brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

101. Hadassa Devorah Malka Beller Cohen is the sister of Yair Beller, who was injured as a result of the October 7 Attack. Hadassa Devorah Malka Beller Cohen is a U.S. citizen. Hadassa Devorah Malka Beller Cohen brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

102. Ashira Beller is the sister of Yair Beller, who was injured as a result of the October 7 Attack. Ashira Beller is a U.S. citizen. Ashira Beller brings claims for personal

injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**T. Bar-Or Family**

103. Lior Yovel Bar-Or was a victim of the October 7 Attack. At the time of the acts alleged herein, Lior Yovel Bar-Or was a U.S. citizen. Lior Yovel Bar-Or was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Lior Yovel Bar-Or brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

104. Orit Dina Bar-Or is the mother of Lior Yovel Bar-Or, a U.S. citizen, who was injured as a result of the October 7 Attack. Orit Dina Bar-Or is an Israeli citizen. Orit Dina Bar-Or brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

105. Marc Leon Brawer (a.k.a. Marc Leon Bar-Or) is the father of Lior Yovel Bar-Or, who was injured as a result of the October 7 Attack. Marc Leon Brawer is a U.S. citizen. Marc Leon Brawer brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

106. Zohar Tzlil Bar-Or is the sister of Lior Yovel Bar-Or, who was injured as a result of the October 7 Attack. Zohar Tzlil Bar-Or is a U.S. citizen. Zohar Tzlil Bar-Or brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

107. Hila Malka Bar-Or (a.k.a. Hila Malka Bar-Or Lohr) is the sister of Lior Yovel Bar-Or, who was injured as a result of the October 7 Attack. Hila Malka Bar-Or is a U.S.

citizen. Hila Malka Bar-Or brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**U. Boltax Family**

108. Matan Eliyahu Boltax was a victim of the October 7 Attack. At the time of the acts alleged herein, Matan Eliyahu Boltax was a U.S. citizen. Matan Eliyahu Boltax was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Matan Eliyahu Boltax brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

109. Jonathan Marshall Boltax is the father of Matan Eliyahu Boltax, who was injured as a result of the October 7 Attack. Jonathan Marshall Boltax is a U.S. citizen. Jonathan Marshall Boltax brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

110. Arlyn Barrie Boltax (a.k.a. Arlyn Fertel) is the mother of Matan Eliyahu Boltax, who was injured as a result of the October 7 Attack. Arlyn Barrie Boltax is a U.S. citizen. Arlyn Barrie Boltax brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

111. Eliora Yerushalaim Boltax is the sister of Matan Eliyahu Boltax, who was injured as a result of the October 7 Attack. Eliora Yerushalaim Boltax is a U.S. citizen. Eliora Yerushalaim Boltax brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

112. Amichai Yisrael Boltax is the brother of Matan Eliyahu Boltax, who was injured as a result of the October 7 Attack. Amichai Yisrael Boltax is a U.S. citizen. Amichai Yisrael

Boltax brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

113. N.E.B. is the sister of Matan Eliyahu Boltax, who was injured as a result of the October 7 Attack. N.E.B. is a U.S. citizen. N.E.B., a minor child, is represented by Jonathan Marshall Boltax as Next Friend for purposes of this lawsuit. Jonathan Marshall Boltax, on behalf of N.E.B., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

114. N.T.T.B. is the brother of Matan Eliyahu Boltax, who was injured as a result of the October 7 Attack. N.T.T.B. is a U.S. citizen. N.T.T.B., a minor child, is represented by Jonathan Marshall Boltax as Next Friend for purposes of this lawsuit. Jonathan Marshall Boltax, on behalf of N.T.T.B., brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**V. Bromberg Family**

115. David Tuvial Bromberg (a.k.a. David Tovial Bromberg) was a victim of the October 7 Attack. At the time of the acts alleged herein, David Tuvial Bromberg was a U.S. citizen. David Tuvial Bromberg was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. David Tuvial Bromberg brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

116. Isaac Samuel Bromberg is the father of David Tuvial Bromberg, who was injured as a result of the October 7 Attack. Isaac Samuel Bromberg is a U.S. citizen. Isaac Samuel Bromberg brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

117. Rachel Bromberg is the mother of David Tuvial Bromberg, who was injured as a result of the October 7 Attack. Rachel Bromberg is a U.S. citizen. Rachel Bromberg brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**W. Bukspan Family**

118. Gal Bukspan was a victim of the October 7 Attack. At the time of the acts alleged herein, Gal Bukspan was a U.S. citizen. Gal Bukspan was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Gal Bukspan brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

119. Merav Bukspan is the mother of Gal Bukspan, a U.S. citizen, who was injured as a result of the October 7 Attack. Merav Bukspan is an Israeli citizen. Merav Bukspan brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

120. Ran Bukspan is the father of Gal Bukspan, a U.S. citizen, who was injured as a result of the October 7 Attack. Ran Bukspan is an Israeli citizen. Ran Bukspan brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

121. Lior Bukspan Amir (a.k.a. Lior Bukspan) is the sister of Gal Bukspan, a U.S. citizen, who was injured as a result of the October 7 Attack. Lior Bukspan Amir is an Israeli citizen. Lior Bukspan Amir brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.



**X. Diller Family**

122. Jonathan Alesandro Diller (a.k.a. Yoni Diller) was a victim of the October 7 Attack. At the time of the acts alleged herein, Jonathan Alesandro Diller was a U.S. citizen. Jonathan Alesandro Diller was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Jonathan Alesandro Diller brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**Y. Englanoff Family**

123. David Englanoff was a victim of the October 7 Attack. At the time of the acts alleged herein, David Englanoff was a U.S. citizen. David Englanoff was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. David Englanoff brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

124. Shir Levi is the common-law wife of David Englanoff, a U.S. citizen, who was injured as a result of the October 7 Attack. Shir Levi is an Israeli citizen. Shir Levi brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

125. Samuel Englanoff is the brother of David Englanoff, who was injured as a result of the October 7 Attack. Samuel Englanoff is a U.S. citizen. Samuel Englanoff brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

126. Mordechai Nissim Englanoff is the brother of David Englanoff, who was injured as a result of the October 7 Attack. Mordechai Nissim Englanoff is a U.S. citizen. Mordechai Nissim Englanoff brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

127. Deborah Itzhak (a.k.a. Deborah Englanoff) is the sister of David Englanoff, who was injured as a result of the October 7 Attack. Deborah Itzhak is a U.S. citizen. Deborah Itzhak brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

128. Shlomo Englanoff (a.k.a. Shlomo Lilvia) is the brother of David Englanoff, who was injured as a result of the October 7 Attack. Shlomo Englanoff is a U.S. citizen. Shlomo Englanoff brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**Z. Gabay Family**

129. Sheerel Gabay was a victim of the October 7 Attack. At the time of the acts alleged herein, Sheerel Gabay was a U.S. citizen. Sheerel Gabay was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

130. Liron Mazeh Gabay is the mother of Sheerel Gabay, who was injured as a result of the October 7 Attack. Liron Mazeh Gabay is a U.S. citizen. Liron Mazeh Gabay brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

131. Gil Gabay is the father of Sheerel Gabay, who was injured as a result of the October 7 Attack. Gil Gabay is a U.S. citizen. Gil Gabay brings claims for personal injury, pain

and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

132. Orel Gabay is the sister of Sheerel Gabay, who was injured as a result of the October 7 Attack. Orel Gabay is a U.S. citizen. Orel Gabay brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**AA. Doe (Victim1) Family**

133. Jane Victim1 Doe was a victim of the October 7 Attack. At the time of the acts alleged herein, Jane Victim1 Doe was a U.S. citizen. Jane Victim1 Doe was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Jane Victim1 Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

134. John Father Doe is the father of Jane Victim1 Doe, a U.S. citizen, who was injured as a result of the October 7 Attack. John Father Doe is an Israeli citizen. John Father Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

135. Jane Mother Doe is the mother of Jane Victim1 Doe, a U.S. citizen, who was injured as a result of the October 7 Attack. Jane Mother Doe is an Israeli citizen. Jane Mother Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

136. Jane Victim2 Doe is the sister of Jane Victim1 Doe, who was injured as a result of the October 7 Attack. Jane Victim2 Doe is a U.S. citizen. Jane Victim2 Doe brings claims for

personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**BB. Doe (Victim2) Family**

137. Jane Victim2 Doe was a victim of the October 7 Attack. At the time of the acts alleged herein, Jane Victim2 Doe was a U.S. citizen. Jane Victim2 Doe was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Jane Victim2 Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

138. John Father Doe is the father of Jane Victim2 Doe, a U.S. citizen, who was injured as a result of the October 7 Attack. John Father Doe is an Israeli citizen. John Father Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

139. Jane Mother Doe is the mother of Jane Victim2 Doe, a U.S. citizen, who was injured as a result of the October 7 Attack. Jane Mother Doe is an Israeli citizen. Jane Mother Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

140. Jane Victim1 Doe is the sister of Jane Victim2 Doe, who was injured as a result of the October 7 Attack. Jane Victim1 Doe is a U.S. citizen. Jane Victim1 Doe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**CC. Karplus Family**

141. Gilad Karplus was a victim of the October 7 Attack. At the time of the acts alleged herein, Gilad Karplus was a U.S. citizen. Gilad Karplus was injured by an act of

“torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Gilad Karplus brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

142. Omry Karplus is the father of Gilad Karplus, a U.S. citizen, who was injured as a result of the October 7 Attack. Omry Karplus is an Israeli citizen. Omry Karplus brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**DD. ADoe Family**

143. Jane Victim ADoe was a victim of the October 7 Attack. At the time of the acts alleged herein, Jane Victim ADoe was a U.S. citizen. Jane Victim ADoe was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Jane Victim ADoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

144. John Father ADoe is the father of Jane Victim ADoe, who was injured as a result of the October 7 Attack. John Father ADoe is a U.S. citizen. John Father ADoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

145. Jane Mother ADoe is the mother of Jane Victim ADoe, who was injured as a result of the October 7 Attack. Jane Mother ADoe is a U.S. citizen. Jane Mother ADoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

146. John Brother1 ADoe is the brother of Jane Victim ADoe, who was injured as a result of the October 7 Attack. John Brother1 ADoe is a U.S. citizen. John Brother1 ADoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

147. John Brother2 ADoe is the brother of Jane Victim ADoe, who was injured as a result of the October 7 Attack. John Brother2 ADoe is a U.S. citizen. John Brother2 ADoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**EE. Levy Family**

148. Ori Levy was a victim of the October 7 Attack. At the time of the acts alleged herein, Ori Levy was a U.S. citizen. Ori Levy was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Ori Levy brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

149. Oren Levy is the father of Ori Levy, a U.S. citizen, who was injured as a result of the October 7 Attack. Oren Levy is an Israeli citizen. Oren Levy brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

150. Ortal Levy is the mother of Ori Levy, a U.S. citizen, who was injured as a result of the October 7 Attack. Ortal Levy is an Israeli citizen. Ortal Levy brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

151. Nadir Levy is the brother of Ori Levy, who was injured as a result of the October 7 Attack. Nadir Levy is a U.S. citizen. Nadir Levy brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**FF. Medalia Family**

152. Carmel Medalia was a victim of the October 7 Attack. At the time of the acts alleged herein, Carmel Medalia was a U.S. citizen. Carmel Medalia was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Carmel Medalia brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**GG. BDoe Family**

153. Jane Victim BDoe was a victim of the October 7 Attack. At the time of the acts alleged herein, Jane Victim BDoe was a U.S. citizen. Jane Victim BDoe was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Jane Victim BDoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

154. John Father BDoe is the father of Jane Victim BDoe, a U.S. citizen, who was injured as a result of the October 7 Attack. John Father BDoe is an Israeli citizen. John Father BDoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

155. Jane Mother BDoe is the mother of Jane Victim BDoe, who was injured as a result of the October 7 Attack. Jane Mother BDoe is a U.S. citizen. Jane Mother BDoe brings

claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

156. Jane Sister1 BDoe is the sister of Jane Victim BDoe, who was injured as a result of the October 7 Attack. Jane Sister1 BDoe is a U.S. citizen. Jane Sister1 BDoe, a minor child, is represented by John Father BDoe as Next Friend for purposes of this lawsuit. John Father BDoe, on behalf of Jane Sister1 BDoe, brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

157. Jane Sister2 BDoe is the sister of Jane Victim BDoe, who was injured as a result of the October 7 Attack. Jane Sister2 BDoe is a U.S. citizen. Jane Sister2 BDoe, a minor child, is represented by John Father BDoe as Next Friend for purposes of this lawsuit. John Father BDoe, on behalf of Jane Sister2 BDoe, brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**HH. Oz Family**

158. Aviv Oz was a victim of the October 7 Attack. At the time of the acts alleged herein, Aviv Oz was a U.S. citizen. Aviv Oz was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Aviv Oz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

159. Roxanne Nina Elliott is the fiancée of Aviv Oz, a U.S. citizen, who was injured as a result of the October 7 Attack. Roxanne Nina Elliott is an Israeli citizen. Roxanne Nina Elliott brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.



160. Moshe Oz is the father of Aviv Oz, a U.S. citizen, who was injured as a result of the October 7 Attack. Moshe Oz is an Israeli citizen. Moshe Oz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

161. Nava Oz (a.k.a. Nava Goren) is the mother of Aviv Oz, who was injured as a result of the October 7 Attack. Nava Oz is a U.S. citizen. Nava Oz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

162. Yaniv Oz is the brother of Aviv Oz, a U.S. citizen, who was injured as a result of the October 7 Attack. Yaniv Oz is an Israeli citizen. Yaniv Oz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

163. Gil Yosef Oz is the brother of Aviv Oz, a U.S. citizen, who was injured as a result of the October 7 Attack. Gil Yosef Oz is an Israeli citizen. Gil Yosef Oz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

164. Hadar Oz is the brother of Aviv Oz, who was injured as a result of the October 7 Attack. Hadar Oz is a U.S. citizen. Hadar Oz brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

## **II. Porat Family**

165. Gal Porat was a victim of the October 7 Attack. At the time of the acts alleged herein, Gal Porat was a U.S. citizen. Gal Porat was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Gal Porat brings claims for

personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

166. Ofer Porat is the father of Gal Porat, a U.S. citizen, who was injured as a result of the October 7 Attack. Ofer Porat is an Israeli citizen. Ofer Porat brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

167. Anat Porat is the mother of Gal Porat, a U.S. citizen, who was injured as a result of the October 7 Attack. Anat Porat is an Israeli citizen. Anat Porat brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

168. Ron Esther Porat is the sister of Gal Porat, a U.S. citizen, who was injured as a result of the October 7 Attack. Ron Esther Porat is an Israeli citizen. Ron Esther Porat brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

169. Raz Porat is the sister of Gal Porat, a U.S. citizen, who was injured as a result of the October 7 Attack. Raz Porat is an Israeli citizen. Raz Porat brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**JJ. Segev Family**

170. Ella Schechter Segev was a victim of the October 7 Attack. At the time of the acts alleged herein, Ella Shechter Segev was a U.S. citizen. Ella Schechter Segev was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7

Attack. Ella Schechter Segev brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**KK. Shaham Family**

171. Maya Shaham was a victim of the October 7 Attack. At the time of the acts alleged herein, Maya Shaham was a U.S. citizen. Maya Shaham was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Maya Shaham brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

172. Guy Shaham (a.k.a. Guy Schwartz) is the father of Maya Shaham, a U.S. citizen, who was injured as a result of the October 7 Attack. Guy Shaham is an Israeli citizen. Guy Shaham brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

173. Stacy Marla Shaham (a.k.a. Stacy Marla Fromm) is the mother of Maya Shaham, who was injured as a result of the October 7 Attack. Stacy Marla Shaham is a U.S. citizen. Stacy Marla Shaham brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

174. Aviv Shaham is the brother of Maya Shaham, who was injured as a result of the October 7 Attack. Aviv Shaham is a U.S. citizen. Aviv Shaham brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

175. Oren Shaham is the brother of Maya Shaham, who was injured as a result of the October 7 Attack. Oren Shaham is a U.S. citizen. Oren Shaham brings claims for personal

injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**LL. Tal Family**

176. Hila Tal was a victim of the October 7 Attack. At the time of the acts alleged herein, Hila Tal was an Israeli citizen. Hila Tal was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack.

177. Ofir Tal is the father of Hila Tal, who was injured as a result of the October 7 Attack. Ofir Tal is a U.S. citizen. Ofir Tal brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**MM. Weisberger Family**

178. Shelley Sharon Weisberger was a victim of the October 7 Attack. At the time of the acts alleged herein, Shelley Sharon Weisberger was a U.S. citizen. Shelley Sharon Weisberger was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. Shelley Sharon Weisberger brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

179. Bella Weisberger is the mother of Shelley Sharon Weisberger, a U.S. citizen, who was injured as a result of the October 7 Attack. Bella Weisberger is an Israeli citizen. Bella Weisberger brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

180. Keith Stewart Weisberger is the father of Shelley Sharon Weisberger, who was injured as a result of the October 7 Attack. Keith Stewart Weisberger is a U.S. citizen. Keith

Stewart Weisberger brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

**NN. CDoe Family**

181. John Victim CDoe was a victim of the October 7 Attack. At the time of the acts alleged herein, John Victim CDoe was a U.S. citizen. John Victim CDoe was injured by an act of “torture, extrajudicial killing, . . . [or] hostage taking” as defined in 28 U.S.C. §§ 1605A(a) and 1605A(h)(7), and in section 3 of the TVPA, in connection with the October 7 Attack. John Victim CDoe is represented by John Father CDoe for purposes of this lawsuit. John Father CDoe, on behalf of John Victim CDoe, brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

182. John Father CDoe is the father of John Victim CDoe, who was injured as a result of the October 7 Attack. John Father CDoe is a U.S. citizen. John Father CDoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

183. Jane Mother CDoe is the mother of John Victim CDoe, who was injured as a result of the October 7 Attack. Jane Mother CDoe is a U.S. citizen. Jane Mother CDoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

184. Jane Sister1 CDoe is the sister of John Victim CDoe, who was injured as a result of the October 7 Attack. Jane Sister1 CDoe is a U.S. citizen. Jane Sister1 CDoe brings claims for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

185. Jane Sister2 CDoe is the sister of John Victim CDoe, who was injured as a result of the October 7 Attack. Jane Sister2 CDoe is a U.S. citizen. Jane Sister2 CDoe brings claims

for personal injury, pain and suffering, economic damages, and/or punitive damages resulting from the acts alleged herein.

## DEFENDANTS

### A. Islamic Republic of Iran

186. Defendant Iran is a foreign sovereign state.

187. For decades, Iran has engaged in and materially supported anti-Israel and anti-American terror attacks, including through its Islamic Revolutionary Guards (“IRGC”)-Quds Force (“Quds Force”) and its nonstate partners and military proxies, including Hamas, Palestinian Islamic Jihad (“PIJ”), Hezbollah, and the Houthis. Iran’s Quds Force has been classified as a Specially Designated Global Terrorist organization by the U.S. Department of Treasury since October 25, 2007. As set forth herein, Iran provided material support and resources for the October 7 Attack.

188. Iran is not immune from the jurisdiction of this Court because Plaintiffs are seeking money damages “for personal injury or death that was caused by an act of torture, extrajudicial killing, . . . hostage taking, or the provision of material support or resources for such an act,” as provided for in the Terrorism Exception. 28 U.S.C. § 1605A(a).

189. Iran is now and has been designated a State Sponsor of Terrorism since January 19, 1984, pursuant to Section 6(j) of the Export Administration Act of 1979, 50 U.S.C. Appx. § 2405(j), and section 620A of the Foreign Assistance Act of 1961, 22 U.S.C. § 2371.

190. 28 U.S.C. § 1605A(a)(2)(A)(i)(I) allows a court to hear claims against a foreign state related to an act of state-sponsored terrorism if the claimants or the victims meet certain requirements in other provisions of 28 U.S.C. § 1605A(a)(2) and “the foreign state was designated a state sponsor of terrorism . . . as a result of such act . . . and remains so designated.” Because Iran was “designated as a state sponsor of terrorism at the time” of the October 7, 2023

act of torture, extrajudicial killing, and hostage taking on which Plaintiffs' claims are based, and "remains so designated" at the time of the filing of those claims, the requirements of 28 U.S.C. § 1605A(a)(2)(A)(i)(I) are met.

**B. Syria**

191. Defendant Syria is a foreign sovereign state.

192. For decades, Syria has engaged in and materially supported anti-Israel and anti-American terror attacks, including specifically attacks by Hamas and Hezbollah in Israel. As set forth herein, Syria provided material support and resources for the October 7 Attack.

193. Syria is not immune from the jurisdiction of this Court because Plaintiffs are seeking money damages "for personal injury or death that was caused by an act of torture, extrajudicial killing, . . . hostage taking, or the provision of material support or resources for such an act," as provided by 28 U.S.C. § 1605A(a).

194. Syria is now and has been designated as a State Sponsor of Terrorism since December 29, 1979, pursuant to Section 6(j) of the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j), and section 620A of the Foreign Assistance Act of 1961, 22 U.S.C. § 2371.

195. 28 U.S.C. § 1605A(a)(2)(A)(i)(I) allows a court to hear claims against a foreign state related to an act of state-sponsored terrorism if the claimants or the victims meet certain requirements in other provisions of 28 U.S.C. § 1605A(a)(2) and "the foreign state was designated a state sponsor of terrorism . . . as a result of such act . . . and remains so designated." Because Syria was "designated as a state sponsor of terrorism at the time" of the October 7, 2023 act of torture, extrajudicial killing, and hostage taking on which Plaintiffs' claims are based, and "remains so designated" at the time of the filing of those claims, the requirements of 28 U.S.C. § 1605A(a)(2)(A)(i)(I) are met.

**C. North Korea**

196. Defendant North Korea is a foreign sovereign state.

197. For decades, North Korea has supported Palestinian militant groups, including in connection with terrorist attacks in Israel. North Korea has specifically supported Iranian proxies such as Hamas and Hezbollah in connection with attacks in Israel. As set forth herein, North Korea provided material support and resources for the October 7 Attack.

198. North Korea is not immune from the jurisdiction of this Court because Plaintiffs are seeking money damages “for personal injury or death that was caused by an act of torture, extrajudicial killing, . . . hostage taking, or the provision of material support or resources for such an act,” as provided by 28 U.S.C. § 1605A(a).

199. North Korea is now and has been designated as a State Sponsor of Terrorism since November 20, 2017, pursuant to Section 6(j) of the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j), and section 620A of the Foreign Assistance Act of 1961, 22 U.S.C. § 2371.

200. 28 U.S.C. § 1605A(a)(2)(A)(i)(I) allows a court to hear claims against a foreign state related to an act of state-sponsored terrorism if the claimants or the victims meet certain requirements in other provisions of 28 U.S.C. § 1605A(a)(2) and “the foreign state was designated a state sponsor of terrorism . . . as a result of such act . . . and remains so designated.” Because North Korea was “designated as a state sponsor of terrorism at the time” of the October 7, 2023 act of torture, extrajudicial killing, and hostage taking on which Plaintiffs’ claims are based, and “remains so designated” at the time of the filing of those claims, the requirements of 28 U.S.C. § 1605A(a)(2)(A)(i)(I) are met.



## **FACTUAL ALLEGATIONS**

201. As set forth more fully below, each of the Defendants has long provided material support to Hamas and specifically provided material support and/or resources that allowed Hamas to execute the October 7 Attack and cause death and heinous injuries to Plaintiffs herein.

### **A. The Hamas Terrorist Organization**

202. The Islamic Resistance Movement (Harakat-Al-Muqawama Al-Islamia), known by its Arabic acronym “Hamas,” is an extremist fundamentalist Islamic Palestinian terrorist organization.

203. Hamas operates in Gaza, the West Bank, and Lebanon, and has leadership based in several countries around the region. Since taking over control of the Gaza Strip by force of arms from fellow Palestinians in 2007, as described below, Hamas’s center of gravity has been in the Hamas-controlled Gaza Strip. Hamas’s stated primary goal is to eradicate the State of Israel and establish a Palestinian Islamic regime in its place. Since its inception, Hamas has used extreme violence to promote this goal. Hamas does not conceal its genocidal intent with respect to Israel and Israelis, including the Israeli-Americans who live there. The Preamble of the Hamas charter, issued on August 18, 1988, states: “Israel will exist and will continue to exist until Islam will obliterate it, just as it obliterated others before it.” Hamas’s call for the destruction of Israel continues to this day.

204. Since 1993, Hamas’s military wing, known as the “al-Qassam Brigades,” has been the primary terrorist group responsible for violent attacks in and against Israel, causing the deaths of dozens of Americans and hundreds of Israeli citizens, figures which increased dramatically on October 7, 2023.

205. In 1995, the U.S. designated Hamas a Specially Designated Terrorist organization. In 1997, the U.S. designated Hamas a Foreign Terrorist Organization. And since 2001, the U.S. has designated Hamas a Specially Designated Global Terrorist.

206. In 2005, Israel unilaterally disengaged from the Gaza Strip, removing Israeli Defense Forces (“IDF”) installations and forces, and removing over 9,000 Israeli citizens across 25 settlements. After Israel’s withdrawal from Gaza, elections were held in 2006 for the Palestinian Legislative Council, with Hamas winning the majority of seats. After Hamas’s election, a power struggle ensued with Fatah, the party of Yasser Arafat, which had dominated Palestinian politics for almost a half-century. After a bloody and brutal civil war, Hamas ultimately took control of the Gaza Strip, and expelled Fatah from Gaza in June 2007.

207. Since 2007, Hamas has been the *de facto* governing body in Gaza.

208. Since seizing power over Gaza in 2007, Hamas has dedicated the majority of its activity to building a military industrial complex and carrying out numerous attacks in Israel, from kidnappings and killings to suicide bombings and rocket attacks.

209. U.S. courts, including courts in this District, have repeatedly found Hamas responsible for terrorist attacks that caused the death of American and Israeli citizens in Israel. *See, e.g., Fuld v. Islamic Republic of Iran*, No. 20-CV-2444-RCL, 2024 WL 1328790 (D.D.C. Mar. 28, 2024); *Estate of Henkin v. Islamic Republic of Iran*, No. 18-cv-1273-RCL, 2023 WL 3319425 (D.D.C. May 9, 2023); *Estate of Steinberg v. Islamic Republic of Iran*, No. 17-cv-1910 (RCL), 2019 WL 6117722 (D.D.C. Nov. 18, 2019); *Baxter v. Islamic Republic of Iran*, No. 11-cv-02133, 2019 U.S. Dist. LEXIS 243209 (D.D.C. Sept. 27, 2019); *Braun v. Islamic Republic of Iran*, 228 F. Supp. 3d 64 (D.D.C. 2017); *Fraenkel Estate of Botvin v. Islamic Republic of Iran*, 873 F. Supp. 2d 232 (D.D.C. 2012).

**B. The Islamic Republic of Iran**

210. For decades, Iran has been a sworn enemy of Israel and the U.S., and has committed and materially supported terrorist attacks against Israeli and American interests and citizens around the globe, including in Israel. The U.S. designated Iran a State Sponsor of Terrorism in 1984. Iran engages in and supports anti-American and anti-Israel terror attacks across the Middle East, including through the IRGC, as well as its proxies, Hamas, PIJ, Hezbollah, and more recently, the Houthis in Yemen.

211. The IRGC is branch of the Iranian Armed Forces, which Iran established in the aftermath of the Iranian Revolution. Highly institutionalized, the IRGC is currently a force parallel to that of Iran’s regular armed forces, with upward of 190,000 under its command. With its own ground force, air force, navy and intelligence branches, the IRGC has become the dominant group in defense policy and domestic political and economic affairs in Iran. The U.S. designated the IRGC a foreign terrorist organization in April 2019, finding that it “participates in, finances, and promotes terrorism as a tool of statecraft.”

212. One branch of IRGC – the Quds Force (lit. “Jerusalem Force”) – is a special operations unit founded in 1990 shortly after the Iran-Iraq war. The IRGC-Quds Force is one of Iran’s “primary tool[s]” for conducting covert lethal activities outside of Iran, including terrorist operations. Because of the IRGC-Quds Force’s terrorist activities and support of other terrorist groups like Hamas, the U.S. designated it a Specially Designated Global Terrorist Organization in October 2007. On April 28, 2019, the U.S. designated the IRGC organization as a whole as a Foreign Terrorist Organization.

**1. Iran's Provision of Material Support and Resources to Hamas**

213. The evidence of Iran's material support for Hamas's terrorist activities, including the October 7 Attack, is overwhelming. Iran's relationship with Hamas dates back to the early 1990s when Hamas grew to prominence in Gaza, and this relationship continues strong today.

214. Iran, including through its IRGC-Quds Force, is dedicated to projecting Iranian influence through its use and support of a complex network of state and nonstate partners and military proxies outside the territory of Iran – including in Lebanon, the Palestinian territories, Iraq, Yemen, and Syria. In the case of the Palestinian territories, Iran projects its power through its support for Hamas, among other terrorist organizations.

215. Thus, through the IRGC and otherwise, Iran has caused, facilitated, and materially supported a wide range of terrorist activities against Americans and Israelis, including the October 7 Attack, by funding, training, and providing weapons and other resources to its proxies, including Hamas, enabling the terrorists to plan and execute terror attacks in Israel, like the October 7 Attack. Indeed, Iran's hundreds of millions of dollars in funding to Hamas over the years have paid for intelligence operations, weapons and training, as well as organizational costs, all of which materially supported and provided resources for those attacks, including the October 7 Attack. Over the years, Iran also has publicly announced its financial support and compensation to families of Palestinian terrorists who committed attacks in Israel.

216. Courts in this District repeatedly have held Iran liable for terrorist attacks carried out by Hamas in Israel, due to Iran's long and documented history of providing material support to Hamas, including by supplying weapons, training Hamas members, and arranging funding for Hamas. As a result of Iran's material support, courts in this District repeatedly have held that Iran is liable to American victims of state-sponsored terrorism for terrorist acts carried out by Hamas in Israel. *See, e.g., Fuld v. Islamic Republic of Iran*, No. 20-CV-2444-RCL, 2024 WL

1328790 (D.D.C. Mar. 28, 2024); *Estate of Henkin v. Islamic Republic of Iran*, No. 18-cv-1273-RCL, 2023 WL 3319425 (D.D.C. May 9, 2023); *Force v. Islamic Republic of Iran*, 464 F. Supp. 3d 323 (D.D.C. 2020); *Estate of Steinberg v. Islamic Republic of Iran*, No. 17-cv-1910 (RCL), 2019 WL 6117722 (D.D.C. Nov. 18, 2019); *Baxter v. Islamic Republic of Iran*, No. 11-cv-02133, 2019 U.S. Dist. LEXIS 243209 (D.D.C. Sept. 27, 2019); *Braun v. Islamic Republic of Iran*, 228 F. Supp. 3d 64 (D.D.C. 2017); *Fraenkel Estate of Botvin v. Islamic Republic of Iran*, 873 F. Supp. 2d 232 (D.D.C. 2012); *Bennett v. Islamic Republic of Iran*, 507 F. Supp. 2d 117 (D.D.C. 2007); *Bodoff v. Islamic Republic of Iran*, 424 F. Supp. 2d 74 (D.D.C. 2006); *Campuzano v. Islamic Republic of Iran*, 281 F. Supp. 2d 258 (D.D.C. 2003); *Stern v. Islamic Republic of Iran*, 271 F. Supp.2d 286 (D.D.C. 2003); *Weinstein v. Islamic Republic of Iran*, 184 F. Supp. 2d 13 (D.D.C. 2002).

217. As one court in this District has found, “there is near-universal agreement that Iran has provided ‘critical’ material support – in the form of cash, weapons, and training – for Hamas’s terrorist activities since at least the mid-1990s.” The court further found that Iran’s relationship with Hamas grew even closer after 2006, when Hamas won its plurality of seats in the Palestinian parliament after Israel’s withdrawal from Gaza, “prompting Iranian support, finances and arms [to] r[i]se exponentially.”

218. Indeed, as that court also found, both Iran and Hamas “have repeatedly acknowledged the support that Iran provides,” including specifically to the “Axis of Resistance” – a collection of organizations including Hamas, PIJ, and the Yemeni Houthis, whose goal it is to expand Iranian influence and destroy Israel. Just a few examples during the period leading up to the October 7 Attack include:

- a. A 2014 statement by Supreme Leader of Iran Ayatollah Ali Khamenei stating that “[w]e helped Hizbullah of Lebanon . . . in the same way that we helped . . . Hamas and Islamic Jihad . . . and we will continue to do that . . . we managed to strengthen the fists of our Palestinian brothers in Gaza and by Allah’s favor we will continue to do that”; he further stated “Our people love fighting against the Zionists and the Islamic Republic has proved this as well.”;
- b. A 2017 letter from General Qassem Soleimani – then commander of the IRGC-Quds Force – to Hamas leader Ismail Haniyeh to congratulate him on being elected to be the head of Hamas’s political bureau, stating:

We look forward to strengthening cooperation with you, the allies of the Axis of Resistance. Together, we will restore light on the Palestinian issue. I sincerely hope that your jihad continues until the liberation of the Al-Aqsa Mosque and all Palestinian land, and until Jerusalem becomes a meeting place for all Muslims.;
- c. A 2020 statement by Khamenei reiterating Iran’s deep commitment to supporting Hamas: “Iran will spare no effort to support the Palestinian people to restore their right and hold off the evil schemes of the Zionist entity.”;
- d. A letter from General Soleimani sent prior to his death in 2020, calling for the annihilation of Israel and pledging that “Islamic Iran will never leave Palestine.”; and
- e. A January 2021 statement by IRGC Aerospace Force commander Amir Ali Hajizadeh, who boasted: “All the missiles you might see in Gaza and Lebanon were created with Iran’s support.”

219. As recorded in video and press accounts, Hamas is likewise open about Iran's material support and provision of resources to Hamas's terrorist activities, especially in Israel. In 2017, for example, Hamas leader Yahya Sinwar stated that "the Islamic Republic of Iran is playing a central role in providing Hamas with financial and military assistance and the training of Hamas' military wing Al-Qassam Brigades." Sinwar also stated that "Iran has never failed to provide the movement with all forms of support since the Israeli aggression on Gaza in 2014." Also in 2017, Saleh al-Arouri, a founding commander of the al-Qassam Brigades and prominent Hamas leader, stated that Iran was the "main and primary benefactor" of the al-Qassam Brigades, "whether through knowledge or assistance." In 2020, al-Arouri further stated that "Iran has given Hamas and the resistance movements all the support and weapons they need." Also in 2020, a senior Hamas leader in Gaza confirmed Iran's ongoing support, stating that Iran's support for the "Palestinian resistance" would be "greater than ever, with no restrictions and in any way the Palestinian resistance wishes."

220. Senior Hamas and other "Axis of Resistance" officials continued to make such public pronouncements in the period leading up to the October 7 Attack. In 2021, senior PIJ official Ramez Al-Halabi said that rockets used to target Israel "bear the signature of Iran and Soleimani," that the IRGC trained PIJ members, and that Iranian money was used to buy weapons in Gaza. According to Al-Halabi, every home in Gaza has Soleimani's portrait, and "it is they [Iran] who support us with weapons, money, and food." Meanwhile Yahya Sinwar announced Hamas's "complete gratitude . . . to the Islamic Republic of Iran, which has spared us and the other Palestinian resistance factions nothing in recent years. They have provided us with money, weapons, and expertise." In 2023, senior Hamas official Khalil Al-Haya asserted that Iran "supports Hamas and the resistance forces and helps us with money and weapons." And PIJ

leader Ziyad al-Nakhalah said on television that “the weapons that the Palestinians use for fighting come from Iran,” either directly or by paying for them, and that Iran has provided “billions of dollars” to support the Palestinian efforts, including \$150,000,000 annually to Hamas.

221. Other reports suggest even higher levels of support. In 2019, when the U.S. sanctioned Iran for its role in financing, training, and arming Hamas, the U.S. Financial Crimes Enforcement Network (“FinCEN”) determined that Iran’s support to Hamas during periods of substantial collaboration could be as high as \$300 million per year, and FinCEN subsequently estimated that Iran has provided as much as \$100 million per year to Hamas since 2018. These figures are consistent with a report that Iran’s Supreme Leader had expressed Iran’s willingness to raise its monthly support to the terror group to \$30 million per month. And the Congressional Research Service recently cited a source finding that Iran had increased funding for Hamas’s military wing in the past year to \$350 million annually.

222. Iran uses a variety of methods – both simple and advanced – to deliver financial support to Hamas in Gaza, ranging from suitcases of cash to cryptocurrency to bank transfers through foreign branches of Iranian-owned banks, a practice the U.S. Treasury Department and the European Commission have been tracking for years. Indeed, it is because of this financial support that the U.S. government has in recent years designated multiple Iranian banks, including the Central Bank of Iran, for their support of terrorism and proliferation activities.

223. In addition to money, Iran has provided Hamas with weapons, ammunition and supplies, materials, and technological training, including for purposes of manufacturing weapons in Gaza, all of which materially supported the October 7 Attack. This, too, is no secret. In 2021, the U.S. State Department observed that “Iran has maintained a near-global procurement



network, obtaining cutting-edge technology from companies and locales around the world to bolster its terrorist and military capabilities.”

224. Nor does Hamas conceal this support. In 2020, the Commander from the Military Production Unit of the al-Qassam Brigades said on camera that, “the weapons came to us, by land and sea, from hundreds and thousands of kilometers away. Various types of weapons have arrived to Gaza from Iran. Other countries, like Syria, have also played a role in arming the resistance.” With Iran’s assistance, Hamas has significantly upgraded its weapons arsenal with enhanced accuracy, longer ranges, heavier warheads, and improved launchers.

225. Iran also has provided training and logistical support that has enabled Hamas to coordinate and execute attacks in Israel, such as the October 7 Attack. Specifically, Iran has facilitated training of terrorist operatives in IRGC and other military bases in Iran, Syria, and Lebanon. In 2019, the Hamas official newspaper “Al-Risala” published an article outlining Iran’s military support to Hamas, including training of Hamas members in military specializations. And in November 2023, after the October 7 Attack, retired IRGC General Ezzatollah Zarghami reported in an interview how Iran supplied Hamas with Iranian Fajr-3 rockets (modified North Korean-supplied rocket systems) used in the October 7 Attack, and used Hamas’s tunnels for travel and training with respect to the usage of these rockets.

226. Iran’s material support for Hamas was a more than substantial cause of the October 7 Attack and Iran is therefore liable for that attack. Indeed, Hamas never could have conducted the Attack without material support from Iran, both historically and in the period leading up to the Attack.

227. Only days after the October 7 Attack, the BBC reported that a spokesman for Hamas, Ghazi Hamad, admitted that Hamas had received support from Iran for the October 7

Attack. And just recently, following the death of Iranian President Ebrahim Raisi, Hamas leader Ismail Haniyeh told an Iranian official on camera that President Raisi's death was "a great loss for Palestine because the role of the President and Foreign Minister were great in the 'Battle of Aqsa Flood'" – the name Hamas has given to the October 7 Attack.

228. According to current and former U.S. officials, decades of Iranian arms, funding, and military training made the October 7 Attack possible. Not only did Hamas use the funds and weapons (rockets, missiles, drones, assault weapons, and ammunition) supplied by Iran, but also received material training and support, without which Hamas could not have carried out such a complicated and calculated attack.

229. It has been estimated that hundreds of militants, including Hamas militants, received specialized combat training in Iran leading up to the October 7 Attack. Numerous meetings also were reportedly conducted between Hamas and Iranian leaders and military officials during the period leading up to the Attack, including:

- a. From April to June 2023, Iranian leaders, including Iran's Supreme leader Ayatollah Khamenei and Iranian President Ebrahim Raisi, publicly hosted Hamas and PIJ leaders in Iran and Syria.
- b. In June 2023, Quds Force commander Esmail Qaani met in Tehran with Hamas leader Ismail Haniyeh and PIJ leader Ziyad Al-Nakhala; according to the Congressional Research Service Haniyeh himself reportedly visited Tehran at least three times between 2019 and the October 7 Attack.
- c. On June 19, 2023, Haniyeh met with a delegation of Iranian security and military officials.

- d. On June 21, 2023, Haniyeh met with the Ayatollah Ali Khamenei, as well as a delegation of high-level Iranian security and military officials.
- e. In August, 2023, Hamas deputy leader Salah Al-Arouri publicly acknowledged: “We are preparing for an all-out war, and we are discussing the prospects of this war with all relevant parties,” which, one report concluded, “surely included the IRGC and Hizbollah, with whom Hamas leaders met regularly in a ‘joint war room’ in Beirut.”

230. Since October 7, statements made by Iranian officials have further confirmed Iran’s material support for the Attack. Not only have Iran’s leaders consistently praised the Attack, supporting and encouraging the terrorist perpetrators, Iran’s IRGC has since boasted of its connections to the Attack, calling it one of its own operations. On October 28, 2023, IRGC commander General Hossein Salami publicly stated: “All it takes to break Israel is one of *our* operations.”

231. Iran provided material support and resources to Hamas – both in the decades leading up to the October 7 Attack, and in the period leading up to the Attack – that enabled Hamas to carry out the October 7 Attack. Hamas could not have carried out the Attack without Iran’s support and sponsorship, and Iran knew that Hamas would use its support and resources to carry out attacks such as the October 7 Attack.

232. As a direct and proximate result of the material support and resources Iran provided to Hamas, thousands of innocent people were killed or injured by Hamas in connection with the October 7 Attack, including Plaintiffs herein.

**C. The Syrian Arab Republic**

233. Syria's Ba'athist government, which seized power in a coup in 1963, also has engaged in state sponsored terrorism for decades, including specifically in Israel, as part of its terrorist campaign against Israel and against western and American interests.

234. The U.S. designated Syria as a state sponsor of terrorism in 1979, and Syria remains on the list of state sponsors of terrorism "because of its continued support of terrorism and terrorist groups."

235. Syria's long-standing and extensive support for Hamas terrorism has been repeatedly recognized by courts in this District, which have held Syria liable for Hamas attacks in Israel. *See, e.g., Fuld*, 2024 WL 1328790, at \*4-6; *Jakubowicz v. Islamic Republic of Iran*, No. 18-1450 (RDM), 2022 WL 3354719, at \*7 (D.D.C. Aug. 9, 2022); *Borochoy v. Islamic Republic of Iran, et al.*, 589 F.Supp. 3d 15, 26 (D.D.C. 2022) (vacated and remanded on other grounds); *Henkin*, 2021 WL 2914036, at \*2; *Force*, 464 F. Supp. 3d at 341; *Estate of Steinberg*, 2019 WL 6117722, at \* 8; *Roth v. Syrian Arab Republic*, No. 1-14-cv-01946-RCL, 2018 WL 4680270, at \*8 (D.D.C. Sept. 28, 2018); *Fraenkel*, 248 F. Supp. 3d at 31; *Braun*, 228 F. Supp. 3d at 71-72.

236. As one court in this District just recently held:

Hamas and its leaders have also received substantial material support and resources from Syria, including among other things: operational and logistical support for its militants in the West Bank and Gaza, safe haven for its leadership in Damascus, the training of its militants, safe passage and transit across Syrian territory, and the provision of financial assistance as a matter of state policy.

*Fuld*, 2024 WL 1328790, at \*6.

**1. Syria's Provision of Material Support and Resources to Hamas**

237. As another court in this District recently held, Syria, like Iran, has been supporting proxy forces in attacks in Israel for many decades.

238. As that court found, Syria has supported Hamas dating back to when Hamas announced its existence in the late 1980s, and Syria's relationship with and direct support of Hamas spans decades. Syria also has "formed a particularly close relationship with the PIJ" – Hamas's partner in the "Axis of Resistance" – "based on their 'total agreement to forcefully fight against and obstruct the peace process' between Israel and Palestine." In fact, also since 1988, the PIJ's senior leadership reportedly has been based out of Damascus.

239. Hamas, too, opened an office in Damascus in the early 1990s, and in the aftermath of failed peace negotiations between Syria and Israel in the early 1990s and the signing of the Oslo I Accord in 1993, Syria steadily increased its backing for Hamas.

240. At the same time, Hamas's presence in Syria increased throughout the 1990s, as the Kingdom of Jordan increased restrictions on Hamas during the leadup to and after its 1994 peace treaty with Israel, which culminated in Hamas moving its Political Bureau to Damascus in 2000.

241. Hamas's Damascus office, established by a senior commander of Hamas's al-Qassam Brigades, served, according to one report, as an "operational headquarters of the Hamas military wing and a nexus for the transfer of external funds to Hamas operatives in" the West Bank and Gaza.

242. Although Syria's relationship with Hamas changed temporarily during the Syrian civil war, the relationship was reinvigorated after Hezbollah restored its own ties with Syria in 2017. With Qassem Soleimani and Hezbollah's assistance, Hamas and Syria formally resumed ties in 2022.

243. In holding Syria responsible for other Hamas attacks in Israel, courts in this District have found that Hamas has routed weapons shipments originating from Iran through Syria and from there to Gaza. In addition to refuge, weapons, and training, Syria has also historically provided Hamas with financial support.

244. Syria's support for Hamas terrorism persists. In 2018, the U.S. Treasury Department uncovered an "oil-for-terror" scheme in which oil was shipped from Iran to the Assad regime in Syria, which would then sell the oil and give hundreds of millions of dollars to the IRGC from the proceeds. From there, the IRGC would distribute the funds to Hamas and Hezbollah.

245. In October 2022, Syria hosted two senior Hamas officials in Syria and publicly reaffirmed its support for Hamas. The state news agency SANA reported that Syrian President Bashar al-Assad told the Hamas delegation that "despite the war that Syria is being subjected to, it did not change its stance on backing resistance by all forms." That same month, Hamas chief of Arab relations, Khalil al-Hayya, discussed with reporters in Damascus Hamas's renewed relations with Syria: "This is a glorious and important day, in which we come back to our dear Syria to resume joint work."

246. As one court in this District has found, the safe haven in Damascus "provided by Syria allowed Hamas to solidify its organizational structure," transformed Hamas "into a leading terrorist organization with the sophistication needed to carry out terror attacks," and allowed it "to increase [its] military capabilities and solidify itself as a major player in the Palestinian arena." As another court in this District observed in 2017, "[w]ithout Syria's support from the early 1990s to 2012, Hamas would not be as strong or organized as it is today." And another court in 2024 observed that, as a result of Syria's support, "Hamas continues to use the tactical

know-how which Hamas gained while under Syrian protection,” and “the effects of Syria’s support will continue to be relevant for years to come.”

247. Syria’s material support allowed Hamas to carry out the October 7 Attack. Indeed, Syria publicly affirmed its support for the October 7 Attack as it was occurring. The day of the Attack, the Assad regime issued a statement praising it, using the name given to the terrorist operation by Hamas, “Operation Al-Aqsa Flood”: “Syria raises its head high in honor of the martyrs of the Palestinian revolution and the heroes who planned and achieved the Al-Aqsa Flood operation, and affirms its standing by the Palestinian people and their fighting forces against terrorism and the Zionist methodology.”

248. In the period leading up to the October 7 Attack, Hamas leader Ismail Haniyeh stated publicly that Hamas’s long-range rocket arsenal “came from abroad, from Iran, Syria, and others . . . .” There are also reports that Syria’s trafficking of billions of dollars’ worth of the amphetamine-like drug, Captagon, “has helped to spread violence across the region,” noting that “Hamas terrorists’ reported use of the drug only adds to the carnage.” In November 2023, U.S. Congressman Jared Moskowitz (D-Florida) co-sponsored bipartisan legislation that calls on the U.S. Government to dismantle the illicit production and trafficking of Captagon, noting that Captagon, which the Assad regime in Syria “creates and distributes across the region,” aided Hamas in the October 7th attack; “[C]aptagon pills were found on the bodies of dead Hamas terrorists, allowing them to remain alert and restless as they slaughtered innocent men, women, and babies.”

249. Decades of Syria’s financial, logistical, and military support and provision of resources, including specifically during the period leading up to the October 7 Attack, materially

facilitated Hamas's preparation for and execution of the October 7 Attack, and the terrorizing, murder, and injuring of thousands of innocent people, including Plaintiffs in this case.

250. Syria provided material support and resources to Hamas – both in the decades leading up to the October 7 Attack, and in the period leading up to the Attack – that enabled Hamas to carry out the October 7 Attack. Hamas could not have carried out the Attack without Syria's support and sponsorship, and Syria knew that Hamas would use its support and resources to carry out attacks such as the October 7 Attack.

251. As a direct and proximate result of the material support and resources Syria provided to Hamas, thousands of innocent people were killed or injured by Hamas in connection with the October 7 Attack, including Plaintiffs herein.

**D. The Democratic People's Republic of Korea**

252. Defendant North Korea is a totalitarian dictatorship. For three generations, it has been ruled by the Kim family. North Korea has long been hostile to the U.S. and Israel; the first Kim family dictator, Kim Il Sung, called Israel an "imperialist satellite" of the U.S.

253. As one court in this District has found:

As a matter of policy, North Korea is hostile to the United States, and North Korea has attempted to undermine the political, economic, and strategic power and influence of the United States and its democratic allies. To accomplish this objective, North Korea has previously supported numerous Communist and other anti-Western terrorist organizations. These terrorist organizations are not only opposed to the United States, but they are also opposed to the State of Israel, which they view as allied with the United States.

254. As a result of North Korea's policy, "North Korea has directly supported terrorist organizations that have carried out attacks in Israel," and courts in this District and elsewhere have held North Korea liable for such attacks. *See, e.g., Kaplan v. Hezbollah*, 213 F. Supp. 3d 27



(D.D.C. 2016); *Calderon-Cardona v. Democratic People's Republic of Korea*, 723 F. Supp. 2d 441 (D.P.R. 2010).

255. The U.S. first designated North Korea as a state sponsor of terrorism in 1988. That designation was officially lifted in 2008 as part of negotiations regarding the dismantling and oversight of North Korea's nuclear weapons program. However, on November 20, 2017, the U.S. re-listed North Korea as a state sponsor of terrorism after the Secretary of State determined that North Korea "had repeatedly provided support for acts of international terrorism since its State Sponsor of Terrorism designation was rescinded in 2008."

**1. North Korea's Provision of Material Support and Resources to Hamas**

256. North Korea has long been providing arms, training, technology, and other assistance to Palestinian militants, including Iran's proxy partners – Hezbollah and Hamas. Indeed, North Korea has provided many of the capabilities these proxies required to carry out their terrorist activities, including attacks in Israel such as the October 7 Attack.

257. According to experts and public reports, in the 1970s and 1980s, there was a steady stream of North Korean weapons and other assistance to Palestinian militants. And into the late 1980s, "North Korea trained Palestinian terrorists, both those belonging to the [Palestinian Liberation Organization ("PLO")] and from Syrian and Libyan backed groups." During the Cold War, North Korea's activities had been largely subsidized by the USSR. However, when Soviet subsidies to North Korea waned in the early 1990s, North Korea needed a new benefactor, and turned to Iran. Since that time, North Korea has continued its large-scale military support to Syria, as well as to Iran and its proxies, including Hamas and Hezbollah.

258. North Korea's support for aggression and attacks in Israel in particular has been part of this effort for decades. North Korea established a relationship with Yasser Arafat in the 1960s, and for decades thereafter supplied arms and training to multiple Palestinian militant

groups, including the PLO, the Popular Front for the Liberation of Palestine (“PFLP”), and the Democratic Front for the Liberation of Palestine. North Korea supported efforts against Israel during the Six-Day War in 1967 and in the 1973 Yom Kippur War. North Korea also supported the Japanese Red Army, three members of which were recruited by the PFLP for the 1973 terrorist attack on Lod Airport, which killed 26 people and injured 80 others. Another court in this District held North Korea responsible for materially supporting that attack in Israel as well.

259. In more recent years, North Korea’s support for enemies of Israel (and America) extended to Iran and Iranian proxies, beginning with Hezbollah. According to experts, this support included supplying rocket systems and launchers, specialized training for “commando” units and their commanders, and small arms such as machine guns and rifles. Indeed, as a key supplier of arms to Iranian proxies, North Korea has maintained a steady, large-scale proliferation of weapons systems to Iran – everything from conventional weapons to ballistic missiles. This proliferation has been ongoing since the early 1980s and continues today. North Korea knows, or is reckless in not knowing, that weapons it supplies to Iran, Syria, and others, are likely to be sent to Hamas and used in terrorist attacks in Israel, such as the October 7 Attack.

260. A court in this District also found North Korea to have provided specific assistance to Iran’s proxies in connection with the design and construction of underground tunnel networks used in attacks in Israel. In that case, the Court found that North Korea provided “professional, military, and intelligence training and assistance in building a massive network of underground military installations, bunkers, depots and storage facilities” that Hezbollah used to wage war against Israel in 2006. Indeed, according to a research report, Hezbollah entered into a \$13 million arrangement in 2013 with the Korea Mining Development Trading Corporation (a North Korean state-owned arms dealer and exporter of weapons and missile technology and

equipment) to build a huge, 45-kilometer underground tunnel system, connecting key hubs in Lebanon. As far back as 2014, the former director for Asian affairs at the White House National Security Council observed that, as with Hezbollah, “ Hamas’ vast tunnel network almost certainly benefited from outside assistance, whether directly from North Korea or via Iran.” At that same time, the *Telegraph* reported that Israeli military commanders supervising operations against Gaza similarly concluded that North Korean experts gave Hamas advice on building its extensive network of tunnels that enabled fighters to move weapons without detection by Israeli drones. That belief has continued to prevail in reports ever since, and Hamas used the same tunnel network in executing the October 7 Attacks and holding hundreds of hostages captive thereafter.

261. North Korea’s most recent wave of weapons proliferation to Hamas began at least as early as 2009, when North Korea was caught shipping more than 35 tons of military equipment, including small arms, rocket propelled grenades (“RPGs”), and other weapons for use by Iran’s terrorist proxies. Investigators confirmed that the shipment had been paid for by Iran, and was on its way for delivery to Hezbollah and Hamas. According to experts, this intercepted shipment was undoubtedly one of multiple shipments from North Korea to Hezbollah and Hamas.

262. North Korea’s support for Hamas continued. In July 2014, *The Telegraph* reported that North Korea entered into a deal with Hamas to sell the terrorist organization rockets, rocket launchers, and communications gear – including guidance systems for multiple rocket launchers. According to experts, North Korea’s support of Hamas had become increasingly important at that time because Iran’s support for Hamas had temporarily slowed (but certainly did not stop) due to differences between them during the Syrian civil war. Accordingly, during that period (generally from 2012-2017), North Korea’s support for Hamas

increased substantially. And when Iran renewed its typical support for Hamas after 2017, all three state sponsors of terrorism – Iran, North Korea, and Syria – combined to strengthen Hamas’s terrorist organization with material support and resources leading up to the October 7 Attack.

263. North Korea’s material support for the October 7 Attack was substantial and contributed greatly to the Attack’s massively devastating impact. In addition to its support in helping Hamas build the tunnel network the terrorists used in carrying out the Attack and then keeping hostages captive, North Korea’s weapons featured prominently in Hamas’s rampage. The Hamas terrorists who committed the Attack used at least hundreds of North Korean-supplied weapons. Many were found on, or left behind by, the terrorists, and bore unique North Korean markings demonstrating their source. Hamas did not try to conceal the source of this weaponry. Hamas propaganda videos showcase their terrorist fighters holding clearly marked and easily identifiable North Korean weapons, with their unique features, including the same types of weapons included in the 2009 interdicted shipment.

264. Public reports further confirmed North Korea’s support of the October 7 Attack. South Korea’s National Intelligence Service “confirmed Hamas’s possession and use of North Korean-made weapons against Israel,” releasing photographs of North Korean-made F-7 grenade launchers (RPGs) being used by Hamas on October 7. A Hamas field manual, found on the body of a Hamas terrorist, included instructions for operating the North Korean F-7 RPGs. Other reports also provide evidence that North Korea supplied rocket shells used by Hamas in the Attack. A senior official at South Korea’s Joint Chiefs of Staff reported that “Hamas is believed to be directly or indirectly linked to North Korea in various areas, such as the weapons trade, tactical guidance and training,” and that Hamas “employed attack methods similar to

Pyongyang's modus operandi." Public news reports discuss how the IDF confirmed recovering large numbers of North Korean weapons from Hamas terrorists, and further reported that Hamas repurposed F-7 engines to create anti-tank RPGs used in the October 7 Attack.

265. North Korea provided material support and resources to Hamas – both in the decades leading up to the October 7 Attack, and in the period leading up to the Attack – that enabled Hamas to carry out the October 7 Attack. Hamas could not have carried out the Attack without North Korea's support and sponsorship, and North Korea knew that Hamas would use its support and resources to carry out attacks such as the October 7 Attack.

266. As a direct and proximate result of the material support and resources North Korea provided to Hamas, thousands of innocent people were killed or injured by Hamas in connection with the October 7 Attack, including Plaintiffs herein.

**E. The October 7, 2023 Hamas-Led Terrorist Attack in Israel**

267. At daybreak on Saturday, October 7, 2023, on the Jewish Sabbath, *Shabbat*, and during the celebration of the Jewish holiday *Simchat Torah*, approximately three thousand Hamas-led terrorists swarmed into Israeli communities near the Israel-Gaza border and waged the deadliest massacre of Jews since the Holocaust.

268. The October 7 Attack – codenamed Operation Al-Aqsa Flood – was an unprecedented coordinated land, sea, and air cross-border attack. Many Israeli soldiers were on leave due to the holiday, and the terrorists capitalized on this to impose maximum casualties.

269. Around 6:30 am in Israel, air raid sirens sounded, warning citizens of a rocket attack in progress. The terrorists launched thousands of rockets and missiles toward communities in southern and central Israel, while Hamas terrorists piloted squadrons of armed drones to destroy guard posts and Israeli surveillance, communication, and defensive weapons systems near the Israel-Gaza border that could protect innocent victims from the terror onslaught.

Next, armed terrorists used explosive devices to breach the security fence separating Gaza from Israel in dozens of locations and infiltrated Israel. This made way for thousands of armed terrorists, many riding motorcycles or racing forward in pick-up trucks and vans carrying heavy weaponry, including antitank launchers, machine guns, rifles, rounds and rounds of ammunition, and an arsenal of explosive devices. The terrorists descended on Israeli communities by land, sea, and air, with some terrorists paragliding into Israel, and others storming Israeli beaches on motorboats.

270. The terrorists divided into teams with specific attack plans, and according to a document recovered from the body of a slain Hamas terrorist, their primary goal was “inflicting the maximum possible human casualties.” Another goal was to kidnap civilians and soldiers to use as human shields and bargaining chips following the Attack.

271. Shortly after launching the rockets and missiles to facilitate the wider Attack, armed terrorists went on a murdering spree, killing anyone in sight. Some terrorists set up makeshift roadblocks and then gunned down passengers in cold blood. Hundreds of cars were lit on fire and left burning on the road.

272. The terrorists murdered indiscriminately, killing men, women, the elderly, teenagers, toddlers, and babies. They overran police stations and Israeli military bases. They massacred hundreds at a music festival. They attacked bomb shelters where terrified civilians tried to take cover. They shot at emergency medical personnel. They invaded Israeli kibbutzim (small, historically agricultural communities) and broke into and destroyed residents’ homes, slaughtering and terrorizing entire communities. Some victims were murdered where they were hiding; videos showed others being rounded up, bound, marched, and executed in the streets.

273. Some individuals and entire families hid in safe rooms for hours (some more than 20 hours) until the Israeli military rescued them. But, not all families who hid in safe rooms were safe. People were burned alive or suffocated by black smoke from the fire that terrorists had set to their homes. Hundreds of people were burned beyond recognition. Many who ran out of their homes trying to escape the unbearable heat and suffocating smoke were met by terrorists waiting outside of their homes and shot dead. Terrorists also forced their way into safe rooms and slaughtered those hiding inside.

274. Children were forced to witness the assassinations of their parents, and then were tortured, burned alive, executed with a bullet through their heads, or butchered. Parents were forced to witness the murder of their children. The terrorists amputated women's breasts and shot both men and women in the genitals.

275. The terrorists sexually abused and mutilated women. Individuals involved in collecting and identifying bodies of those killed by the terrorists in the October 7 Attack reported multiple signs of sexual assault, including broken pelvises, bruises, cuts, and tears on victims ranging from children to the elderly. Dead women were found stripped from the waist down.

276. The terrorists did not hide their atrocities – to the contrary, they used body cameras to live stream and celebrate them. Video footage released by Hamas shows the sexual assaults perpetrated against women, as do numerous eyewitness accounts.

277. The terrorists kidnapped civilians, often targeting the most vulnerable victims, including babies, children, the disabled, and the elderly. Documents found on the bodies of Hamas terrorists revealed instructions to target schools and youth centers and take civilians hostage. Video footage of kidnapped women being paraded through the streets of Gaza and

physically assaulted were uploaded onto social media sites. Hostages were ferreted away, dispersed throughout Gaza, with many taken deep into Hamas's underground tunnel network.

278. Some hostages were subsequently tortured or killed, or later died of their injuries. Other hostages were kept alive to be used as human shields and leverage in political negotiations. By the end of October 7, Hamas-led terrorists had attacked and terrorized more than twenty different Israeli communities, and laid waste to many. More than 1,200 Israelis, Americans, and nationals of other countries were slaughtered and thousands more injured. The depraved terrorists massacred dozens of babies and children, and left many children orphaned. Over 250 people were abducted, including dozens of children. Thousands who miraculously escaped physical injury or death were terrorized, and suffered permanent emotional scars.

**1. Attack at the Nova Music Festival**

279. One of the worst and most shockingly horrific attacks took place at a music festival in an open-air space near Kibbutz Re'im, only three miles from the Gaza border. The Nova Music Festival – a widely popular weekend-long event which celebrates music, love, and unity – was attended by more than 3,000 Israelis and tourists from around the world. The event was timed to the end of the Jewish holiday of *Sukkot*. Thousands were dancing and celebrating life, unaware of the brutal attack that was about to be unleashed on them.

280. At around 6:30 am, festival attendees saw rockets streaking through the sky. Moments later, the festival music stopped as terrorists on motorized paragliders began to land. Many more heavily armed terrorists, who had breached the border, sped toward the festival in motorcycles and pickup trucks with guns and explosives in hand, shooting indiscriminately. While rockets rained down, terrorists shot at festival attendees with live gunfire and RPGs. The armed terrorists surrounded the festival grounds and choked off almost all areas of escape, trapping their victims. As one festival attendee described, it was a “circle of death.” The



terrorists hunted, chased, dragged, shot, and murdered over 350 people – mostly young festival-goers – in cold blood.

281. The festival-goers had only seconds to choose a survival strategy. Some sought protection in nearby bomb shelters. Many ran to their parked cars and tried to drive away. Some ran across open fields to hide under nearby bushes and trees – often for many hours – as the terrorists relentlessly hunted them down. Others played dead.

282. Many were killed while hiding. The terrorists targeted nearby bomb shelters, executing people at point-blank range and throwing hand grenades inside the small concrete structures packed with people. A few festival attendees who had taken refuge in bomb shelters survived by hiding under other festival-goers' dead bodies and pretending to be dead.

283. Some victims were shot in the back as they ran or executed as they hid crouched on the ground. One plaintiff who had run into the bushes was too terrified to move or make any noise so as not to give away his position to the terrorists; he lay on the ground in his own urine for 10 hours until he was rescued.

284. Many festival attendees who reached their cars were trapped in a traffic jam as terrorists fired at vehicles. One plaintiff hid underneath a large tree that overlooked Route 232 – the only paved road to and from the festival – and watched in horror as fellow festival-goers trying to leave in their cars were massacred and their cars set on fire. When the terrorists began chasing after individuals who abandoned their cars, that plaintiff made the decision to leave the tree he was hiding under and run for his life. He ran for 12 miles in open fields with no food or water until he was picked up by residents from a nearby kibbutz. The kibbutz members were driving into the fields near their homes on rescue missions, packing their cars with festival

attendees who had escaped into the fields. Some festival-goers, however, were not as fortunate. Many succumbed to gunshot wounds or collapsed in the fields from dehydration.

285. The terrorists raped and killed many women, including, according to one eyewitness account, a young woman who was gang-raped and then knifed to death by a terrorist, who then continued to rape her dead body while the terrorists around him laughed. Some were found with their naked bodies tied to trees, violated and mutilated.

286. The terrorists took over 40 festival-goers hostage. Video footage showed one female at the music festival being hauled away on a motorcycle, pleading for her life and reaching for her boyfriend, who was bound and being marched by terrorists. Another woman's lifeless and half-naked body was paraded through the streets of Gaza in the back of a truck as armed terrorists surrounding her shouted "Allahu Akbar" ("God is great."). A fragment of her skull, but not her body, was found in Gaza. Seven months later, in May 2024, the IDF recovered her body from Gaza.

287. The following Plaintiffs were injured in the October 7 Attack at the Nova Music Festival, and/or are family members of those who were injured at the Nova Music Festival:

- a. Lior Yovel Bar-Or, injured victim.
- b. Orit Dina Bar-Or, mother of injured victim.
- c. Marc Leon Brawer, father of injured victim.
- d. Zohar Tzlil Bar-Or, sister of injured victim.
- e. Hila Malka Bar-Or, sister of injured victim.
- f. Matan Eliyahu Boltax, injured victim.
- g. Jonathan Marshall Boltax, father of injured victim.
- h. Arlyn Barrie Boltax, mother of injured victim.

- i. N.E.B., sister of injured victim.
- j. N.T.T.B., brother of injured victim.
- k. Eliora Yerushalaim Boltax, sister of injured victim.
- l. Amichai Yisrael Boltax, brother of injured victim.
- m. David Tuvial Bromberg, injured victim.
- n. Isaac Samuel Bromberg, father of injured victim.
- o. Rachel Bromberg, mother of injured victim.
- p. Gal Bukspan, injured victim.
- q. Merav Bukspan, mother of injured victim.
- r. Ran Bukspan, father of injured victim.
- s. Lior Bukspan Amir, sister of injured victim.
- t. Jonathan Alesandro Diller, injured victim.
- u. David Englanoff, injured victim.
- v. Shir Levi, partner of injured victim.
- w. Samuel Englanoff, brother of injured victim.
- x. Mordechai Nissim Englanoff, brother of injured victim.
- y. Deborah Itzhak, sister of injured victim.
- z. Shlomo Englanoff, brother of injured victim.
- aa. Liron Maze Gabay, mother of injured victim.
- bb. Gil Gabay, father of injured victim.
- cc. Orel Gabay, sister of injured victim.
- dd. Jane Victim1 Doe, injured victim and sister of injured victim.
- ee. Jane Victim2 Doe, injured victim and sister of injured victim.

- ff. John Father Doe, father of two injured victims.
- gg. Jane Mother Doe, mother of two injured victims.
- hh. John Victim CDoe, injured victim.
- ii. Jane Mother CDoe, mother of injured victim.
- jj. John Father CDoe, father of injured victim.
- kk. Jane Sister1 CDoe, sister of injured victim.
- ll. Jane Sister2 CDoe, sister of injured victim.
- mm. Gilad Karplus, injured victim.
- nn. Omry Karplus, father of injured victim.
- oo. Jane Victim ADoe, injured victim.
- pp. John Father ADoe, father of injured victim.
- qq. Jane Mother ADoe, mother of injured victim.
- rr. John Brother1 ADoe, brother of injured victim.
- ss. John Brother2 ADoe, brother of injured victim.
- tt. Ori Levy, injured victim.
- uu. Oren Levy, father of injured victim.
- vv. Ortal Levy, mother of injured victim.
- ww. Nadir Levy, brother of injured victim.
- xx. Carmel Medalia, injured victim.
- yy. Jane Victim BDoe, injured victim.
- zz. John Father BDoe, father of injured victim.
- aaa. Jane Mother BDoe, mother of injured victim.
- bbb. Jane Sister1 BDoe, sister of injured victim.

- ccc. Jane Sister2 BDoe, sister of injured victim.
- ddd. Aviv Oz, injured victim.
- eee. Roxanne Nina Elliott, fiancée of injured victim.
- fff. Moshe Oz, father of injured victim.
- ggg. Nava Oz, mother of injured victim.
- hhh. Yaniv Oz, brother of injured victim.
- iii. Gil Yosef Oz, brother of injured victim.
- jjj. Hadar Oz, brother of injured victim.
- kkk. Gal Porat, injured victim.
- lll. Ofer Porat, father of injured victim.
- mmm. Anat Porat, father of injured victim.
- nnn. Ron Esther Porat, sister of injured victim.
- ooo. Raz Porat, sister of injured victim.
- ppp. Ella Shechter Segev, injured victim.
- qqq. Maya Shaham, injured victim.
- rrr. Guy Shaham, father of injured victim.
- sss. Stacy Marla Shaham, mother of injured victim.
- ttt. Aviv Shaham, brother of injured victim.
- uuu. Oren Shaham, brother of injured victim.
- vvv. Ofir Tal, father of injured victim.
- www. Shelley Sharon Weisberger, injured victim.
- xxx. Bella Weisberger, mother of injured victim.
- yyy. Keith Stewart Weisberger, father of injured victim.

**2. Attack at Kibbutz Kfar Aza**

288. Kibbutz Kfar Aza is a small communal farming town only a few miles from Gaza that was home to around 750 people before the Attack. In small towns and kibbutzim near the Gaza border, air raid sirens are fairly commonplace. Residents know to rush to the safe room in their homes until they hear the all clear siren. When residents of Kfar Aza heard the air raid sirens on October 7, warning that rockets had been launched from Gaza toward Israel, they never expected an estimated 70 terrorists to invade their small, close knit community and turn it into a bloody massacre.

289. For example, completely unaware that terrorists were lurking outside of her home, one woman left her family's safe room to grab bottles of milk for her and her husband's 10-month-old twin boys. She was struck dead by a bullet and found in the kitchen lying next to two baby bottles. Only moments earlier, she had sent a text to family members speaking casually about being stuck in the safe room with two dirty diapers. Terrorists executed her husband in the family's safe room. The couple's twin boys were found crying in their soiled diapers on the bed near their father's body. The babies had been there for at least 14 hours without food or water before being rescued by Israeli forces. The terrorists had been seen by neighbors eating on the balcony of the home, while they intentionally left the twins thirsty, hungry, and crying as a trap to lure Israeli forces in to save them. It took three rescue attempts by the Israeli military to get the babies out safely.

290. After hearing gunshots and men speaking Arabic outside their houses, kibbutz members began to realize that terrorists had infiltrated their town. Some individuals and families, including the daughter of one plaintiff, were stuck in a small "safe room" for more than 20 hours without food, water, a bathroom, or electricity, before they were rescued by IDF soldiers.

291. Other families were killed in their safe rooms. The terrorists fired bullets into safe rooms, pounded houses with grenade pellets that burst through the walls, and set houses on fire. One family that had huddled together in a safe room were found dead, their bodies burned so badly that their remains could not be separated.

292. The terrorists went on a killing rampage, gunning down and butchering men, women, and children. Entire families were slaughtered in their homes.

293. At the end of the invasion, more than 100 kibbutz members had been killed in the vicious assault. Gurneys holding bullet-riddled bodies were laid on a basketball court that had become a temporary morgue.

294. Once a quiet, lush communal farm surrounded by sunflower fields, Kfar Aza was left in ruins, with houses reduced to rubble, and some completely burned and charred from grenades that terrorists tossed into homes knowing that families were inside. Some of the homes were so severely burned that archeologists had to be brought in to sift through the ash.

295. The following Plaintiffs are family members of those who were killed or injured at Kibbutz Kfar Aza:

- a. Anita Schwadron Treger, mother of injured victim.
- b. Roland Zeev Treger, father of injured victim.

**3. Attack at Kibbutz Be'eri**

296. Kibbutz Be'eri is a small collective community located approximately three miles east of the Gaza strip, and was home to about 1,200 residents prior to the Attack.

297. Before the October 7 Attack, residents of Be'eri, including Plaintiffs in this case, were well-known for their pro-peace sentiments and altruism to Gazan families. For example, Be'eri residents volunteered to transport Gazans to and from medical care facilities in Israel, and the kibbutz had a fund that was used to give financial assistance to Gazans who came to Be'eri

on work permits. One Plaintiff who the terrorists murdered worked as a midwife for Palestinian and Bedouin families. She sought peace and justice for all, and was active in many efforts to bridge gaps between Jews and Arabs. During the attack on Be'eri, another resident was heard begging for his life before being murdered: "Please, I'm not your enemy."

298. Be'eri was one of the first communities the terrorists targeted in the Attack. Scores of terrorists spent over a day pillaging and destroying the community, and slaughtering, torturing, and kidnapping its residents.

299. Hamas militants arrived at the gates of Be'eri shortly before Hamas began raining down its heavy barrage of rockets on the kibbutz and its neighboring communities. CCTV at Be'eri captured footage of heavily armed men wearing green Hamas bandanas breaking into the kibbutz by smashing the windows of the kibbutz's guard room. The terrorists later opened fire on a sedan that pulled up to the kibbutz's gates, murdering three civilians inside the vehicle who were fleeing from the attack on the Nova festival.

300. Be'eri's 15-person volunteer security team attempted to repel the terrorists, but was vastly outnumbered and overwhelmed by the terrorists with heavy machine guns, who killed at least five of them. The terrorists attacked army bases close to Be'eri, and lined the roads leading to Be'eri and other kibbutzim with gunmen, restricting anyone from coming to rescue the residents of Be'eri and other affected kibbutzim. As a result, the terrorists were able to gain control of Be'eri, and, according to reports, "were largely free to plunder, murder and kidnap."

301. The terrorists systematically went house to house, and door to door, hunting, murdering, torturing, and kidnapping the residents within. The terrorists fired their weapons indiscriminately, threw grenades and Molotov cocktails, and burned down homes and community buildings.



302. While people hid in their safe rooms, the terrorists blew up and shot through the doors, killing those inside. When they did not succeed in penetrating the safe rooms and homes, the terrorists methodically burned them down. People who tried to escape through the windows were met by terrorists waiting outside to kill them. According to one report, “[f]amilies had to choose between being burned alive or shot to death.” A survivor recalled: “Some people were cooked alive inside their safe rooms because of the heat. We saw it.”

303. In some homes, the terrorists mercilessly murdered children in front of their parents, and abducted the parents. In other homes, it was the reverse. Survivors recounted entire families being massacred in their homes.

304. Nearly every home in Be’eri was experiencing similarly barbaric attacks. When it was over, more than 130 residents – more than 10% of the community – had been slaughtered by terrorists, including children, many of them in their homes with their parents.

305. The terrorists also rounded up Be’eri residents and took them hostage for use as bargaining chips and as human shields. More than 50 people were held hostage by terrorists for 18 hours in a kibbutz dining room. In another part of the kibbutz, the terrorists corralled 14 hostages into a home, who they subsequently used as human shields in a standoff with the IDF. Only two of these hostages survived. Among the dead were 12-year-old twins whose bodies were so severely burned that it took more than a month to identify them. The terrorists abducted more than 25 Be’eri residents to Gaza.

306. The cruelty and destruction that the terrorists inflicted on Be’eri defies words. Witnesses describe the sounds of the massacre at Be’eri: “We heard them talking, shouting ‘Allahu akbar,’ laughing. There was the sound of endless automatic gunfire, fires burning, kibbutz residents screaming.”

307. According to one report, “[d]ays after the attack, the twisted carcasses of burned-out cars littered the community. Blood stains covered the floors and walls of some homes; others were half destroyed, gutted by fire. Safe-room doors were pierced with bullet holes. Unexploded grenades and bullet casings lay on the ground.” The bodies of murdered residents laid strewn throughout the village.

308. The devastation in Be’eri was so severe that residents, including some plaintiffs, did not know for days whether their family members were murdered or taken hostage.

309. The following Plaintiffs were injured and killed in the October 7 Attack at Kibbutz Be’eri, and/or are family members of those who were injured and killed at Kibbutz Be’eri:

- a. Adrienne Anne Neta, murdered victim.
- b. Israel Neta, husband of murdered victim.
- c. Nahar Neta, son of murdered victim.
- d. Dror Neta, daughter of murdered victim.
- e. Ayana Neta, daughter of murdered victim.
- f. Carmel Neta, son of murdered victim.
- g. Chen Zeigen, son of murdered victim.
- h. Yonatan Zeigen, son of murdered victim.

**4. Attack at Kibbutz Sa’ad**

310. Kibbutz Sa’ad is a small agricultural kibbutz located about 2 miles from the Gazan border and was home to about 850 residents before the Attack.

311. Sa’ad is one of several small, tight-knit villages in extremely close proximity to one another, including Kibbutz Kfar Aza, Kibbutz Alumim, Kibbutz Nahal Oz, Kibbutz Be’eri, and Kibbutz Kissufim, all of which were attacked by Hamas on October 7. For example, the gate

to Kibbutz Kfar Aza, where terrorists murdered scores of people and took 19 people hostage on October 7, is only a few hundred feet from the gate to Sa'ad. Sa'ad is a little over a mile away from the site of the Nova festival.

312. On October 7, residents of Sa'ad were awoken at around 6:30 am to a barrage of rocket fire that lasted for 30 to 40 minutes. Within fifteen minutes, the kibbutz security team had assembled and grabbed weapons from the kibbutz armory to protect kibbutz residents and their neighbors. The kibbutz declared a state of emergency, and instructed residents to stay inside their homes with their doors locked and their windows closed.

313. Hiding inside their safe rooms, Sa'ad residents huddled in terror as they anxiously sought information about what was happening outside. They were glued to the news, which was constantly evolving as the massacres raged all around them in neighboring communities. They frantically exchanged text messages with friends and family in neighboring communities under attack. And they saw on social media the horrors that were unfolding just minutes away – hundreds of terrorists invading familiar places and massacring their friends and neighbors.

314. Inside their safe rooms, the residents of Sa'ad huddled in terror and fear for their lives as they heard the machine guns and rockets just outside while terrorists attempted to infiltrate Sa'ad. A rocket also hit the kibbutz, shaking the ground and causing shrapnel to fall through a home neighboring the one in which two Plaintiffs were staying. Shooting in the area around the kibbutz was described as “coming from all directions.”

315. One captured terrorist admitted during his interrogation that “[t]he plan was to go from home to home, from room to room, to throw grenades and kill everyone, including women and children [...] Hamas ordered us to crush their heads and cut them off, [and] to cut their legs.” Another captured terrorist disclosed that for each captured hostage, Hamas had offered the

terrorists \$10,000 and an apartment. By the entrance to Sa'ad, a shootout raged between the terrorists and the kibbutz's security team. Miraculously, the security team held off the terrorists from executing the full-scale carnage of the town the terrorists had planned, but could not prevent the permanent scars the terrorists caused the members of the community who they terrorized.

316. The following Plaintiffs were injured in the October 7 Attack at Kibbutz Sa'ad, and/or are family members of those who were injured at Kibbutz Sa'ad:

- a. Naomi Faye Sanders, injured victim and wife of injured victim.
- b. Ofer Gelfand, injured victim and husband of injured victim.
- c. David Jacob Sanders, father of injured victim.
- d. Hila Sanders, mother of injured victim.
- e. Rachel Esther Sanders, sister of injured victim.

**5. Attack at Kibbutz Kissufim**

317. Kibbutz Kissufim is a small farming collective village located in the Gaza Envelope that was home to around 300 people before the Attack. Kissufim is roughly at the midpoint of Gaza's border with Israel, less than two miles from the Gaza Strip.

318. A few minutes after 6:30 am, Kissufim residents were alerted to an attack by air sirens and instructed to take cover in designated safe rooms in each building. They grabbed whatever they could in the few moments they had before sealing the doors of their safe rooms, not knowing that they would be trapped in terror until the next day.

319. Meanwhile, at least 70 armed terrorists had breached the Gaza border near the Kissufim crossing and invaded the community. They were met by Kissufim's security team at the village entrance. Four Kissufim security members were killed trying to defend the village in that initial ambush. Ultimately, the terrorists killed 14 people at Kissufim, including a 90-year

old woman who reportedly was shot in the head in her living room. The terrorists abducted four kibbutz members and took them hostage.

320. The terrorists rampaged through the village, maximizing damage by any means available to them. They shot at and lit aflame cars, homes, and even the animals at Kissufim's dairy farm. They attacked Kissufim's infrastructure by destroying electrical lines and a water main, severing the villagers' access to the outside world and to drinking water. The terrorists lit homes on fire, attempting to lure civilians out into the open, and further the devastation.

321. "Safe rooms" did not ensure security. Two parents and their youngest of three children died of asphyxiation in their safe room after their home burned with them inside.

322. The rest of the residents were trapped, terrified and terrorized in their safe rooms for the entire day as the terrorists ransacked the village. Many hid, without proper ventilation or plumbing and meager food and water rations, while armed terrorists broke into their homes and shot at the safe room doors. Afraid for their lives to leave their safe room, one Plaintiff and her family of three urinated on sheets and defecated in cardboard boxes in the corner of their safe room. With cell and internet service cut off, even those who did bring phones and computers into hiding could not contact the outside world. During this period, their only updates came through the sounds of bullets piercing their homes and terrorists moving about, and the smells of smoke whenever they risked cracking a window for some air.

323. An IDF battalion eventually responded to the ambush at Kissufim in the afternoon of October 7. They exchanged gunfire with the terrorists for hours before neutralizing them, with eight IDF soldiers killed as they tried to clear the kibbutz of terrorists and rescue the residents.

324. Like many others, the village was destroyed and is now uninhabitable. It is unknown when the villagers who survived will be able to return home.

325. The following Plaintiffs were injured in the October 7 Attack at Kibbutz Kissufim, and/or are family members of those who were injured at Kibbutz Kissufim:

- a. Zionah Holtzer Wininsky, injured victim, wife of injured victim, mother of two injured victims.
- b. Michael Winitzky, injured victim and husband of injured victim.
- c. S.W., injured victim and son of injured victim.
- d. E.W., son of injured victim.
- e. David Gray Holtzer, father of injured victim.
- f. Carmi Holtzer, mother of injured victim.
- g. Noam Galit Edri, sister of injured victim.
- h. Ilan Yosef Holtzer, brother of injured victim.
- i. Yonatan Mordechai Holtzer, brother of injured victim.
- j. Lotan Raanan Holtzer, brother of injured victim.

**6. Attack at Sufa Base**

326. Sufa Base is an IDF outpost in southern Israel, next to Gaza and minutes from the Kerem Shalom crossing at the Gaza-Israel-Egypt border. Soldiers stationed at Sufa patrol the lower section of the border between Israel and Gaza and provide security to civilians in their region, including those at three nearby kibbutzim.

327. Around 6:30 am, alarms and sirens rang out across the base, alerting the soldiers to missile strikes and possible attacks on civilians in their vicinity. The patrols already on morning duty immediately left the outpost in the direction of the civilian communities.

328. With the base mostly empty, approximately 30 armed terrorists stormed the front gate of the outpost. Some of the soldiers rushed to the entrance, where they were under constant

attack, trying to hold off the terrorists with gunfire for nearly two hours without additional support. Others barricaded themselves in the dining hall and a bunker.

329. The terrorist attack continued to rage on for nearly 14 hours. Despite resisting the initial attack at the entrance, the soldiers on the base were then attacked by another group of Hamas terrorists who had snuck up on the outpost's back entrance and were firing at the bunker where many soldiers were trapped inside. Approximately 40 terrorists attacked the Sufa Base.

330. Between 1:30 pm and 2 pm, IDF combat units arrived via helicopters and tanks to rescue the soldiers, but could not secure the base until late in the evening. In the meantime, soldiers stationed at the base were working to load the dead bodies of their peers onto the helicopters, to avoid them being dragged away as trophies, and evacuating the critically injured.

331. At least two Israelis were killed in Hamas's attack at Sufa Base, and several more were severely injured. Later in the day, Hamas released video showing the bodies of Israeli soldiers who had been killed in the Attack.

332. The following Plaintiffs were injured in the October 7 Attack at Sufa Base, and/or are family members of those who were injured at Sufa Base:

- a. Yair Beller, injured victim.
- b. Arnona Shapiro-Beller, mother of injured victim.
- c. Noam Menachem Beller, brother of injured victim.
- d. Isaac Beller, brother of injured victim.
- e. Yehuda Shmuel Beller, brother of injured victim.
- f. Hadassa Devorah Malka Beller Cohen, sister of injured victim.
- g. Ashira Beller, sister of injured victim.

7. **Attack at Kibbutz Erez**

333. Kibbutz Erez is a small agricultural kibbutz located less than one mile from Gaza, that was home to around 600 people before the Attack.

334. On October 7, Erez residents were awoken to the sound of sirens blaring, indicating incoming rocket fire from Gaza and alerting residents to go into their safe rooms.

335. This was not an unusual occurrence. Typically, Erez residents would remain in their safe rooms for 5 to 10 minutes while a few rockets were intercepted outside. On October 7, however, residents quickly understood that this event was different when the alarms continued to sound for over 20 minutes while a constant barrage of hundreds of Hamas rockets rained down over their homes.

336. At the same time, Erez's small security team was warned by a neighboring kibbutz that their members had seen terrorists on paragliders soaring into Israel and that a terror attack was underway.

337. Erez's security team quickly assembled in an effort to protect the kibbutz. The members organized themselves into defensive positions around the kibbutz, where some were able to see terrorists approaching the back gate of the kibbutz in white vans. Minutes later, Hamas began its attack in an effort to overcome Erez.

338. Erez residents received text messages from the security team ordering them to rush to bomb shelters, and to lock all doors and windows. Terrified residents heard heavy automatic gunfire outside their homes, as "[d]ozens of terrorists stormed the Kibbutz's defensive fence," which they later shredded with explosives.

339. Meanwhile, news and images of the brutal scenes unfolding in familiar towns and communities only minutes away from their homes began flooding in on residents' phones, social



media platforms, and television news stations, filling the already overwhelmed residents with terror.

340. Outside the residents' hiding places, the kibbutz security team was engaged in an hours-long battle with the terrorists, who unleashed heavy gunfire and explosives, including grenades, bombs, and RPGs, which they aimed over the kibbutz fences, destroying homes.

341. Eventually, in response to pleading by Erez security team members whose ammunition was quickly dwindling, the emergency unit of a nearby kibbutz arrived at Erez. With their help, the Erez security team fought the terrorists attacking the Kibbutz for hours until the IDF arrived later that day.

342. In their homes, as they heard the Attack raging outside their windows, residents could do little more than pray, terrified for their lives, and not knowing whether they would survive the day.

343. The following Plaintiffs were injured in the October 7 Attack at Kibbutz Erez, and/or are family members of those who were injured at Kibbutz Erez:

- a. Juliana Sharoni, injured victim and mother of injured victim.
- b. E.S., injured victim and daughter of injured victim.
- c. Oded Menahem Sharoni, husband of injured victim and father of injured victim.
- d. Sueli Herszkowicz, injured victim and mother of injured victim.
- e. Luciana Ganach, daughter of injured victim and sister of injured victim.
- f. Tatiana Herszkowicz Erlich, sister of injured victim.

**8. Attack at Kibbutz Alumim**

344. Kibbutz Alumim is an agricultural kibbutz that was home to around 500 residents before the Attack. Alumim is located about 2 miles away from the Gaza border, and is situated between Be'eri and Sa'ad, about 2 miles away from each.

345. The residents of Alumim were awoken on October 7 by a deafening cascade of rocket launches from a nearby Iron Dome anti-missile battery, and the resulting booms marking the interceptions of some of the thousands of missiles launched from Gaza by Hamas.

346. By 6:50 am, kibbutz residents, still in their safe rooms, began hearing rounds of gunfire. By 6:52 am, the army command instructed Alumim's security team to activate, and to close the roads and the gates in the fields surrounding Alumim.

347. Within minutes, terrorists were already attempting to break through the back gate of the kibbutz near the agricultural structures – one of the two ways to enter the kibbutz.

348. The terrorists succeeded in blowing the padlock off the back entrance, and began to infiltrate Alumim. By 7:00 am, residents were alerted that terrorists were in the kibbutz, and that they needed to lock their doors and windows, and not to leave their bomb shelters for any reason.

349. The terrorists entered the kibbutz on motorcycles, each carrying multiple heavily armed Hamas militants. They immediately began unleashing carnage – murdering people, shooting indiscriminately, setting fire to haylofts and animal feed trucks, and throwing burning torches into buildings.

350. The first people the terrorists encountered at Alumim were foreign workers, who were in the process of milking the cows. The terrorists murdered nearly twenty of these foreign workers, and kidnapped several others to Gaza. Many others were badly wounded, including by having their limbs blown off by Hamas grenades. Others survived only by hiding for hours.

Some hid beneath their friends' dead bodies. Others cowered in pepper fields, or beneath sinks, or in small alcoves above refrigerators. Another hid beneath cow dung for eight hours, leaving only his nostrils uncovered.

351. At the main entrance to the kibbutz, which borders on a main road, terrorists shot at and slaughtered people who were fleeing in cars and on foot from the nearby Nova festival. Alumim's security footage shows terrorists chasing people down, and captured a horrifying scene of a young woman on her knees begging for mercy, only to be shot dead, and another mercilessly cut down as she fled.

352. Two brothers, both reservists in the IDF, rushed to protect innocents from the ongoing Hamas terror attack, and were both killed battling terrorists along the road near the entrance to Alumim.

353. Members of the 12-person Alumim security team fought intensely for hours against the terrorists who were heavily armed with machine guns and grenades until help finally arrived in the early afternoon.

354. The terrorists continued to attack in and around Alumim. They hunted and terrorized victims fleeing from the Nova festival in Alumim's avocado fields. They infiltrated the kibbutz through those fields, armed with Kalashnikovs and RPGs. As the terrorists rampaged through the kibbutz, members of a unit of the IDF's Engineering Corps raced to the kibbutz to try to save its residents. They arrived just as a Hamas terrorist broke into the home of an elderly kibbutz member and shot him in the stomach. Members of the unit managed to kill the terrorist, but one member, a Plaintiff in this case, was shot and later died from his wounds.

355. The terrorists made eight separate incursions into Alumim, intent on decimating the kibbutz. Like at other kibbutzim, documents recovered from the body of a Hamas commander killed at Alumim contained a map of Alumim with planned lines of attack.

356. Alumim suffered a massive loss of life. In addition to the nearly twenty foreign workers slaughtered by the terrorists, one Israeli civilian was murdered within the confines of the kibbutz along with many others who were killed on Road 232 just outside. Among the dead were also two members of Alumim's security forces, the reservist brothers who volunteered to help, and at least two soldiers, responding to try to save lives, including a Plaintiff here.

357. The following Plaintiffs were injured and killed in the October 7 Attack at Kibbutz Alumim, or are family members of those who were injured and killed at Kibbutz Alumim:

- a. Etai Cohen, murdered victim.
- b. Ortal Pnina Cohen, mother of murdered victim.
- c. Yaniv Yacov Cohen, father of murdered victim.
- d. Noam Cohen, brother of murdered victim.
- e. Ofek Hana Cohen, sister of murdered victim.

**9. Attack at Kibbutz Nir Oz**

358. Kibbutz Nir Oz is an agricultural and manufacturing kibbutz located less than one mile from the border with the Gaza Strip, with two paved roads leading directly to the border fence.

359. Prior to October 7, Nir Oz was home to roughly 400 residents, and was described as a desert oasis due to its lush botanical garden. Many of Nir Oz's residents were peace activists who volunteered to drive sick Gazans to Israeli Hospitals for medical care.

360. At 6:30 in the morning on October 7, Nir Oz residents were awoken to a barrage of rocket fire from Gaza and alarms alerting them to rush to their safe rooms. Residents began to hear fire from automatic weapons, grenades, and RPGs within minutes of the first alarms.

361. Within five minutes, the residents received an alert on the kibbutz's chat application that there was heavy gunfire at neighboring communities, and that they should remain in protected spaces until further notice. Less than fifteen minutes later, Nir Oz was fully under attack. Security cameras captured footage of terrorists arriving to the kibbutz in vehicles and on foot, one of whom fired into the kibbutz's guard post. This group represented the first of at least seven groups of terrorists who arrived "nearly simultaneously from different directions, armed to the teeth."

362. Nir Oz's security team fought to repel the terrorists, but they were outnumbered by the terrorists who ultimately killed or took hostage the majority of the team.

363. As at the other kibbutzim, the terrorists proceeded to go door to door, ruthlessly murdering and kidnapping Nir Oz residents, and looting and setting fire to their homes.

364. The massacre at Nir Oz, committed by hundreds of terrorists, continued relentlessly for hours before the IDF finally cleared the kibbutz 11 hours after the attack began.

365. Much of the attack was also captured on livestream video, as instructed in terrorist handbooks found on the bodies of attackers, which included step-by-step instructions on "how to take captives." In some of these livestream videos, terrorists are seen demanding a dying father to give information about others in the kibbutz, in front of his partner and crying children, two of whom were taken hostage, while the third was murdered after being forced at gunpoint to coax additional neighbors from their homes. The father's partner was also murdered. Terrorists posted another graphic video of an elderly woman's murder on her own Facebook page, for her

friends and family to see. Further video was taken by supposed “journalists,” who accompanied the terrorists during the attack and recorded and reported on the atrocities as they occurred around them.

366. In all, the terrorists murdered 40 people at Nir Oz, abducted 79 people ranging in age from 9 months to 85 years – including family members of certain Plaintiffs – and burned to the ground more than half of the kibbutz’s homes. Over a quarter of the population of Nir Oz was either murdered or taken hostage on October 7. People from Nir Oz accounted for nearly a third of the total number of hostages abducted to Gaza on October 7, and more than half of the child hostages.

367. The following Plaintiffs are family members of those who were killed or injured at Kibbutz Nir Oz:

- a. Ray Cooper, son of murdered victim and son of injured victim.
- b. Ora Cooper, sister of murdered victim.

**10. Attack at Ofakim**

368. The small desert town of Ofakim, 17 miles east from the Israel-Gaza border, was the furthest into Israel that the terrorists managed to infiltrate. To get there, the terrorists advanced from Nir Oz on Route 241, passing and commandeering for a few hours part of the IDF base at Urim, located about halfway between Nir Oz and Ofakim. Once inside Ofakim by about 6:45 am, the terrorists wreaked havoc, shooting civilians in the street, in their homes, and in public shelters, where many, including Plaintiffs in this case, gathered to take shelter from the barrage of rockets pouring down on the town since 6:30 am that morning.

369. With machine guns, grenades and RPGs, terrorists gunned down drivers of passing cars and went door to door, breaking and entering into homes. For those who did not have fortified safe rooms in their homes, as was the case for many in Ofakim’s older dwellings,

they ran to the closest public shelters, some only to be caught in the gunfire. Those who were able – local police officers, active duty soldiers, reservists, security guards, those with their own firearms, even a local rabbi – went out into the streets to try to stave off the inflow of terrorists. The terrorists murdered more than 50 people, mostly civilians, as they tried to defend their community and their families and friends.

370. Although it was under direct attack, both from the missiles above and terrorists on the ground, the Ofakim's ambulance station became a triage center for victims from the Nova Festival and the attacks at nearby kibbutzim. Ofakim's ambulances were some of the first to arrive on the scenes and rescue the injured. Scores of victims, including many with gunshot wounds, were treated in Ofakim.

371. One Plaintiff, a 75-year old volunteer with the national ambulance service, Magen David Adom, was called out at 7:00 am to his post at Ofakim only to come under gunfire from terrorists on Route 241. The bullet pierced the driver's door of his vehicle and just missed his ankle. Once at his station, he was issued body armor to protect against shrapnel from both missiles and bullets and worked a 12-hour shift, picking up and treating the wounded on the roads – including many who he knew personally from his own kibbutz and surrounding communities. It is estimated that in just one of the ambulance stations, 150 wounded people were treated that day.

372. The following Plaintiffs were injured at the October 7, 2023 terrorist attack at Ofakim and/or are family members of those who were injured at Ofakim:

- a. David Gary Holtzer, injured victim and father of injured victim.
- b. Carmi Ruth Spiwack Holtzer, wife of injured victim and mother of injured victim.

- c. Zionah Alexandra Winitzky, daughter of injured victim and sister of injured victim.
- d. Ilan Yosef Holtzer, son of injured victim and brother of injured victim.
- e. Yonatan Mordechai Holtzer, son of injured victim and brother of injured victim.
- f. Lotan Raanan Holtzer, son of injured victim and brother of injured victim.
- g. Noam Galit Edri, injured victim and daughter of injured victim.
- h. Kfir Avraham Edri, husband of injured victim
- i. R.E., son of injured victim.
- j. A.E., son of injured victim.
- k. M.E., daughter of injured victim.

**11. Missile Attacks**

373. Across the area of attacks, from the communities closest to the Gaza border to Ofakim, missiles were raining down. Though missile attacks are not unusual in Israel, the sheer volume on October 7 was. In the first hour of the Attack, the terrorists launched 3,000 missiles into Israel, an onslaught intended to overwhelm Israel's missile defense system. Missiles fell throughout the region, including on communities and on the roads, where defenseless and terrified civilians were under attack. One Plaintiff who was racing home to his family after being warned of terrorists ahead by a group of injured and terrorized Bedouins, had to drive through the missile barrage, with missiles falling not more than one hundred feet from his car.

374. The following Plaintiffs were injured by the October 7, 2023 terrorist attack in missile attacks and/or are family members of those who were killed or injured in missile attacks:

- a. Ilan Yosef Holtzer, injured victim.
- b. Shelly Perelmann Holtzer, wife of injured victim.



- c. Y.H., son of injured victim.
- d. L.H., daughter of injured victim.
- e. M.H., daughter of injured victim.
- f. David Gary Holtzer, father of injured victim.
- g. Carmi Ruth Spiwack Holtzer, mother of injured victim.
- h. Zionah Alexandra Winitzky, sister of injured victim.
- i. Noam Galit Edri, sister of injured victim.
- j. Yonatan Mordechai Holtzer, brother of injured victim.
- k. Lotan Raanan Holtzer, brother of injured victim.

**COUNT I**

**28 U.S.C. § 1605A(C), PRIVATE RIGHT OF ACTION**

375. The foregoing paragraphs are incorporated herein as if fully set forth herein.

376. A foreign state that is or was a state sponsor of terrorism is liable to U.S. nationals for personal injury or death caused by an act of torture, extrajudicial killing, aircraft sabotage, hostage taking, or the provision of material support or resources for such an act, committed by its officials, employees, or agents while acting within the scope of their office, employment, or agency.

377. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

378. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators, in connection with planning and carrying out the October 7 Attack.

379. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

380. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

381. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators, in connection with planning and carrying out the October 7 Attack.

382. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

383. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

384. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators, in connection with planning and carrying out the October 7 Attack.

385. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

386. As a direct and proximate result of the willful, wrongful, intentional and reckless acts of Iran, Syria, North Korea and/or their agents in providing material support for the October 7 Attack, Plaintiffs suffered, *inter alia*, death, torture, hostage-taking, physical pain and suffering, mental anguish, emotional pain and suffering, loss of solatium or consortium, and/or economic losses.

387. Pursuant to 28 U.S.C. § 1605A(c), those Plaintiffs who are each a U.S. national or the estate of a deceased U.S. national may assert a cause of action against Iran, Syria, and North Korea for personal injury or death that was caused by an act of extrajudicial killing, torture, hostage-taking or the provision of material support or resources for such an act.

388. Accordingly, those Plaintiffs who are each a U.S. national or the estate of a deceased U.S. national are entitled to compensatory damages from Defendants for the death or injuries resulting from the willful, wrongful, intentional, and reckless acts of Defendants and/or Defendants' agents.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea, and in favor of the Plaintiffs, in connection with the October 7 Attack.

## **COUNT II**

### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

389. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

390. A party is liable for intentional infliction of emotional distress when it acts in a manner that is outrageous and purposely or recklessly causes emotional distress so severe that it

could be expected to adversely affect mental health and the party's conduct does cause such distress.

391. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

392. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

393. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

394. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

395. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

396. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

397. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein,

willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

398. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

399. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

400. The willful, wrongful, reckless, and intentional acts of Defendants and/or their agents in providing material support and/or resources to the perpetrators of the October 7 Attack in connection with planning and carrying out the October 7 Attack constituted extreme and outrageous conduct on the part of Defendants and/or its agents.

401. As a direct and proximate result of the extreme and outrageous conduct on the part of Defendants and/or its agents, all Plaintiffs suffered severe emotional distress, entitling them to compensatory damages.

402. Pursuant to 28 U.S.C. § 1605A(c) and/or applicable state law, all Plaintiffs may assert a cause of action against Iran, Syria, and North Korea for intentional infliction of emotional distress caused by an act of extrajudicial killing, torture, or hostage-taking, or the provision of material support or resources for such an act.

403. Accordingly, all Plaintiffs are entitled to compensatory damages from Defendants for the severe emotional distress resulting from the willful, wrongful, intentional, and reckless acts of Defendants and/or Defendants' agents.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

**COUNT III**

**WRONGFUL DEATH AND/OR SURVIVAL DAMAGES**

404. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

405. A party is liable for wrongful death if it knowingly or recklessly causes the death of a person.

406. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

407. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

408. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

409. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

410. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

411. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

412. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

413. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

414. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

415. As a direct and proximate result of the willful, wrongful, intentional, and reckless acts of Defendants and/or their agents in providing material support and/or resources to the perpetrators of the October 7 Attack in connection with planning and carrying out the October 7 Attack, certain individuals, who are represented herein as Plaintiffs by their personal representatives, were fatally injured.

416. Pursuant to 28 U.S.C. § 1605A(c) and/or applicable state law, all Plaintiffs who are personal representatives of individuals who were fatally injured may assert a cause of action

against Iran, Syria, and North Korea for wrongful death caused by an act of extrajudicial killing, torture, or hostage-taking, or the provision of material support or resources for such an act.

417. Accordingly, all Plaintiffs who are personal representatives of individuals who were fatally injured are entitled to recover compensatory damages against Defendants for wrongful death and/or survival resulting from the willful, wrongful, intentional, and reckless acts of Defendants and/or their agents.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

#### **COUNT IV**

##### **SOLATIUM AND/OR LOSS OF CONSORTIUM**

418. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

419. A party is liable for solatium and/or loss of consortium when its wrongful acts cause emotional pain and suffering, including due to the loss of, or impairment to, the intangible benefits of a relationship with another.

420. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

421. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.



422. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

423. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

424. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

425. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

426. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

427. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

428. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

429. As a direct and proximate result of the willful, wrongful, intentional, and reckless acts of Defendants and/or their agents in providing material support and/or resources to the

perpetrators of the October 7 Attack in connection with planning and carrying out the October 7 Attack, the Plaintiffs who are family members of individuals who were injured or killed in the October 7 Attack suffered extreme mental anguish, emotional pain and suffering, and the loss of the society and companionship of the victims who were injured or killed.

430. Pursuant to 28 U.S.C. § 1605A(c) and/or applicable state law, all Plaintiffs who are family members of individuals who were injured or killed in the October 7 Attack may assert a cause of action against Iran, Syria, and North Korea for loss of solatium and/or loss of consortium caused by an act of extrajudicial killing, torture, or hostage-taking, or the provision of material support or resources for such an act.

431. Accordingly, all Plaintiffs are entitled to recover compensatory damages against Defendants for solatium and/or loss of consortium resulting from the willful, wrongful, intentional, and reckless acts of Defendants and/or their agents.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

## **COUNT V**

### **AIDING AND ABETTING**

432. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

433. A party is liable in tort for aiding and abetting when it participates in, assists, advices, or solicits an act or omission, committed or about to be committed by another person, or who orders, authorizes, or ratifies such an act or omission.

434. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein,

willfully, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

435. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

436. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

437. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

438. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

439. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

440. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

441. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material

support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

442. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

443. Defendants provided material support and resources to the perpetrators in order to aid, abet, facilitate, and cause the commission of acts of international terrorism, extrajudicial killing, torture, hostage taking, personal injury, pain and suffering, and death, including the injuries to the Plaintiffs herein.

444. Accordingly, Defendants are liable to all Plaintiffs for damages resulting from the acts alleged herein.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

## **COUNT VI**

### **CIVIL CONSPIRACY**

445. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

446. A party is liable for civil conspiracy if there is an agreement between it and one or more other parties to commit an unlawful act that harms a third party and the conspiracy is related to an underlying civil wrong, such as a tort, and the agreement is acted on and causes damage.

447. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described

herein, willfully, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

448. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

449. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

450. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described herein, willfully, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

451. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

452. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

453. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

454. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material

support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

455. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

456. Defendants knowingly, willfully, and recklessly conspired, agreed, and acted in concert with one or more of the other Defendants and/or their agents in a common plan designed to cause an act of coordinated international terrorism, extrajudicial killing, hostage taking, and personal injury. The agreement was acted upon and resulted in the injuries to Plaintiffs herein.

457. Accordingly, Defendants are liable to all Plaintiffs for damages resulting from the acts alleged herein.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

## **COUNT VII**

### **ASSAULT**

458. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

459. A party is liable for assault if it engages in the intentional use of any kind of force, directly or indirectly, against a person's body, in any manner, without that person's consent; or in an attempt or threat, by act or gesture, to use force against a person's body, when the party making the attempt or threat can be reasonably assumed to have the intent or ability to carry out the attempt or threat.

460. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described

herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

461. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

462. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

463. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

464. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

465. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

466. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent civilians, including Plaintiffs.

467. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material

support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

468. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

469. Defendants aided, abetted, authorized, ratified, encouraged, rewarded, and/or participated in the acts of assault committed by Defendants' agents against the Plaintiffs during the October 7 Attack when Hamas terrorists intentionally used force and threatened to use force against Plaintiffs without consent or legal justification.

470. Accordingly, all Plaintiffs who were injured or killed in the October 7 Attack are entitled to recovery against Defendants resulting from the acts alleged herein.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

### **COUNT VIII**

#### **DIRECT LIABILITY**

471. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

472. A party is directly liable for harm suffered by another if it commits a negligent, reckless, or intentional act that a reasonable and prudent person would not have committed under the same circumstances; or refrains from committing an act that a reasonable and prudent person would have committed under the same circumstances, thereby causing damages to any person (that a reasonable person would have under the same circumstances foreseen that, in the ordinary course of events, was liable to be) injured by the act or omission.



473. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

474. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

475. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

476. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

477. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

478. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

479. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

480. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

481. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

482. Defendants intentionally, recklessly, and/or negligently provided funds, weapons, ammunition, military supplies, and training, among other material support, to the perpetrators of the October 7 Attack. Plaintiffs were foreseeably and intentionally harmed by Defendants' conduct.

483. Accordingly, Defendants are liable to all Plaintiffs for damages resulting from the acts alleged herein.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

### **COUNT IX**

#### **PUNITIVE DAMAGES**

484. Paragraphs 1 through 374 are incorporated herein as if fully set forth herein.

485. On October 7, 2023, Iran and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

486. Iran and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

487. The Islamic Republic of Iran was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

488. On October 7, 2023, Syria and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Hamas Terrorist Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

489. Syria and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

490. The Syrian Arab Republic was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

491. On October 7, 2023, North Korea and/or its agents, through the provision of material support and/or resources to the perpetrators of the October 7 Attack as described herein, willfully and/or recklessly, violently, and forcefully caused the terrorist attack in Israel against innocent human beings, including Plaintiffs.

492. North Korea and/or its agents were acting within the scope of their office, employment or agency in committing the acts alleged herein, including providing material support and/or resources to the perpetrators in connection with planning and carrying out the October 7 Attack.

493. The Democratic People's Republic of Korea was and is a state sponsor of terrorism as described in 28 U.S.C. § 1605A(a)(2)(A)(i).

494. Pursuant to 28 U.S.C. § 1605A(c), Defendants are liable to Plaintiffs for punitive damages resulting from the acts alleged herein.

WHEREFORE, Plaintiffs demand that judgment be entered against Defendants the Islamic Republic of Iran, the Syrian Arab Republic, and the Democratic People's Republic of Korea in connection with the October 7 Attack.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray that the Court:

- a. Grant Plaintiffs judgment in their favor against Defendants on Counts I through IX; and
- b. Award Plaintiffs:
  1. Compensatory damages against Defendants in the amount of no less than one billion dollars;
  2. Punitive damages against Defendants in the amount of no less than three billion dollars;
  3. Pre-judgment interest;
  4. Reasonable costs and expenses;
  5. Reasonable attorneys' fees; and
  6. Such other and further relief which the Court may determine to be just and equitable under the circumstances.

Dated: July 1, 2024

Respectfully submitted,

/s/ Aryeh S. Portnoy

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