

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JAMES OWENS, et al.

*Plaintiffs,*

v.

Civil Action No. 22-1949

TALIBAN a/k/a ISLAMIC EMIRATE OF  
AFGHANISTAN

*Defendant.*

**NOTICE OF *EX PARTE* EMERGENCY MOTION  
FOR ORDER OF ATTACHMENT**

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned action hereby move pursuant to Federal Rule of Civil Procedure 64 and New York Civil Practice Law and Rules §§ 6201, 6211, and 6212 for an *ex parte* emergency order authorizing attachment of Defendant's assets in this District held in the name of Da Afghanistan Bank, and all other funds belonging to Defendant in this district, in the amount of \$4,669,011,012.21, plus prejudgment interest. The grounds and reasons for granting this relief have been stated with particularity in the accompanying Memorandum in Support of Plaintiffs' *Ex Parte* Emergency Motion for Order of Attachment, the Declaration of Matthew D. McGill in Support of Plaintiffs' *Ex Parte* Emergency Motion for Order of Attachment, and the accompanying exhibits. Under Local Civil Rule 6.1 and CPLR § 6211, *ex parte* adjudication of this motion is warranted, given difficulties that Plaintiffs will encounter in serving Defendant Taliban a/k/a Islamic Emirate of Afghanistan, and the need for immediate attachment of the assets given the risk of dissipation from other creditors or the United States. A proposed order is submitted herewith.

Dated: March 8, 2022

Respectfully submitted,

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