

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAMES OWENS, et al.

Plaintiffs,

v.

TALIBAN a/k/a ISLAMIC EMIRATE OF
AFGHANISTAN

Defendant.

Civil Action No. 22-cv-01949 (VEC)

**NOTICE OF MOTION
TO CONFIRM THE 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 order confirming this Court's March 21, 2022, order of attachment in the amount of \$4,669,011,012.21. Pursuant to that Order, the U.S. Marshals Service has levied \$1,373,761,042.95 on funds held in the name of Da Afghanistan Bank at the Federal Reserve Bank of New York. The grounds and reasons for granting this relief have been stated with particularity in the accompanying Memorandum in Support of Plaintiffs' Motion to Confirm the Order of Attachment, the Declaration of Matthew D. McGill in Support of Plaintiffs' Motion to Confirm the Order of Attachment, the Expert Declaration of Peter M. Piatetsky, and the Expert Declaration of Michael Templeton. This motion is also based on the reasons and evidence submitted in connection with Plaintiffs' *Ex Parte* Emergency Motion for Order of Attachment. *See* Dkts. 4–6. A proposed order is submitted herewith.

Dated: May 2, 2022

Respectfully submitted,

Rebecca Monck Ricigliano
CROWELL & MORING LLP
590 Madison Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 895-4000
Facsimile: (212) 223-4134
rricigliano@crowell.com

John L. Murino
(*pro hac vice* application forthcoming)
Stuart H. Newberger
(*pro hac vice* application forthcoming)
Emily M. Alban
(*pro hac vice* application forthcoming)
CROWELL & MORING LLP
1001 Pennsylvania Ave. NW
Washington, DC 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116

Caragh Glenn Fay
(*pro hac vice* application forthcoming)
Amanda Fox Perry
(*pro hac vice* application forthcoming)
FAY LAW GROUP, P.A.
6205 Executive Boulevard
Rockville, MD 20852
Telephone: (202) 589-1300
Facsimile: (202) 216-0298

Jane Carol Norman
(admitted *pro hac vice*)
BOND & NORMAN LAW, PC
6205 Executive Blvd.
Rockville, MD 20852
Telephone: (202) 682-4100
Facsimile: (202) 207-1041
jnorman425@icloud.com

/s/ Matthew D. McGill
Matthew D. McGill
Jessica L. Wagner
(admitted *pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 955-8500
Facsimile: (202) 530-9522
mmcgill@gibsondunn.com

Robert L. Weigel
Jason W. Myatt
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 351-4000
Facsimile: (212) 351-5236
rweigel@gibsondunn.com
jmyatt@gibsondunn.com

Counsel for Plaintiffs