

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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) 03 MDL 1570 (GBD)

) ECF Case

In re Terrorist Attacks on September 11, 2001)

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This document relates to:

- Ashton v. Al Qaeda Islamic Army 02-cv-06977*
- Burnett v. Al Baraka Investment and Development Corporation*
- Cantor Fitzgerald & Co. v. Akida Bank Private Limited 04-cv-07065*
- Continental Casualty Company v. Al Qaeda 04-cv-5970*
- Euro Brokers, Inc. v. Al Baraka Investment and Development Corporation 04-cv-7279*
- Federal Insurance Company v. Al Qaida 03-cv-06978*
- New York Marine and General Insurance Company v. Al Qaida 04-cv-6105*
- World Trade Center Properties v. Al Baraka Investment and Development Corp. 04-cv-7280*

**DEFENDANTS SANA-BELL, INC.’S AND SANABEL AL KHEER, INC.’S
INITIAL DISCLOSURES PURSUANT TO F.R.C.P. 26(a)(1)**

Defendants Sana-Bell, Inc. and Sanabel Al Kheer, Inc. (“Defendants”) make the following initial disclosures. These initial disclosures are based on information reasonably available to Defendants as of September 27, 2010. Defendants have not completed their investigation of the facts relating to this case and have not served any discovery in this matter. Moreover, many of the factual allegations in the complaints and other case filings are vague, ambiguous and confusing. As a result, the disclosures herein are provided without prejudice to the rights of Defendants to identify additional witnesses or evidence. Defendants reserve the right to supplement these initial disclosures.

Defendants’ disclosures are also made without in any way waiving (1) the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground to the use of any such information, for any purpose, in whole or in part, in any

subsequent proceeding in this action or any other action; (2) the right to object on any and all grounds, at any time, to any discovery request or proceeding involving or relating to the subject matter of these disclosures; and (3) any of the Affirmative or Other Defenses as set forth in their Answers to the Complaints in the above-captioned matters including any future amendments thereto.

I. Individuals With Relevant Discoverable Information

The following individuals are likely to have discoverable information that Defendants may use to supports its defenses. Defendants do not consent to or authorize any communications with its employees, agents, officers or directors, whether formerly or presently associated or employed by Defendants and do not consent to or authorize any other communication prohibited by any applicable rule of professional conduct.

Dr. Abdelmoniem El-Hillali
Contact through counsel, Christopher C. S. Manning
Dr. El-Hillali is the current president of Sanabel Al Kheer, Inc.

Gregory Brown
Contact through counsel, Christopher C. S. Manning
Mr. Brown is the current secretary of Sanabel Al Kheer, Inc.

Dr. Yaqub Mirza
Contact through counsel, Steve Barentzen
Information regarding Sana-Bell, Inc. and Sanabel Al Kheer, Inc. and their defenses

Henry Hassan
6404 Seven Corners Place #N
Falls Church, VA 22044
Information regarding the finances of Sanabel Al Kheer, Inc.

Current or former officials with BMI, Inc.
Contact information unknown
Knowledge relating to Sana-Bell, Inc.'s investments

All witnesses on Plaintiffs' and Defendants' witness lists.

All witnesses necessary for rebuttal and impeachment.

Any necessary expert witnesses.

II. Description of Relevant Documents by Category and Location

Defendants are in possession of the following categories of documents located at 1120 20th Street, NW, Suite 700N, Washington DC 20036 in hard copy or electronic form. Defendant reserves the right to object to the production of any document, data compilation and tangible thing within the listed category on any basis permitted by the Federal Rules of Civil Procedure.

Documents relating to the ongoing charitable activities of Sanabel Al Kheer, Inc.

Documents relating to the finances of Sanabel Al Kheer, Inc.

Documents relating to the governance of Sanabel Al Kheer, Inc. and Sana-Bell, Inc.

Banking and accounting records of Sanabel Al Kheer, Inc.

Publicly available documents relating to the events of September 11, 2001.

Documents already produced to Plaintiffs relating to Sana-Bell, Inc.

III. Computation of Damages

Not applicable.

IV. Insurance Policies

None.

Respectfully Submitted,

MANNING SOSSAMON PLLC

/s/ Christopher C. S. Manning

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Admitted Pro Hac Vice

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Sanabel Al Kheer, Inc.

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