

**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: *Continental Casualty Company v. Al Qaeda* 04-cv-5970

**DEFENDANT SANABEL AL KHEER, INC'S ANSWER TO PLAINTIFFS'  
SECOND AMENDED COMPLAINT<sup>1</sup>**

1. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
2. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
3. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
4. These allegations are conclusions of law to which no response is required. To the extent these allegations are deemed to require a response, they are denied.
5. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
6. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

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<sup>1</sup> Note that each numbered paragraph in this answer corresponds with and responds to the paragraph in the *Continental Casualty Company v. Al Qaeda* Complaint bearing the same number.

7. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
8. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
9. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
10. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
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25. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.
26. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.
27. Defendant admits only that on September 11, 2001, passenger jet airliners crashed into the World Trade Center Towers in New York, the Pentagon in Arlington County, Virginia, and a field near Shanksville, Pennsylvania. Defendant is without knowledge or

information sufficient to form a belief about the truth of the remaining allegations, and therefore those allegations are denied.

28. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

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452. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

453. Defendant denies all allegations relating to Sana-Bell, Inc. and Sanabel Al Kheer, Inc. Defendant is without knowledge or information sufficient to form a belief about the truth of the remainder of these allegations, and therefore those allegations are denied.

454. Defendant is without knowledge or information sufficient to form a belief about the truth of these allegations, and therefore those allegations are denied.

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595. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

596. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

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## COUNT I

600. Defendant incorporates its responses to the previous paragraphs by reference.

601. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

602. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.



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606. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

## **COUNT II**

607. Defendant incorporates its responses to the previous paragraphs by reference.

608. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

609. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

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613. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

### **COUNT III**

614. Defendant incorporates its responses to the previous paragraphs by reference.

615. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

616. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

617. To the extent that these allegations relate to Defendant, Defendant denies these allegations. To the extent these allegations relate to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about the truth of the allegations, and therefore those allegations are denied.

Defendant denies that Plaintiffs are entitled to recover from Defendant any of the relief requested in the WHEREFORE clause. To the extent the WHEREFORE clause relates to defendants other than Defendant, Defendant is without knowledge or information sufficient to form a belief about this clause and therefore it is denied.

#### **AFFIRMATIVE DEFENSES**

1. Defendant denies any claims in Plaintiffs' Complaint and any accompanying documents not specifically admitted.
2. Plaintiffs fail to state a claim for which relief can be granted.
3. There is no causal connection between any of Defendant's activities and Plaintiffs' asserted injuries.

4. No act or omission of any agent, servant, or employee of Defendant proximately caused any harm or damages to Plaintiffs.
5. Plaintiffs fail to adequately allege scienter.
6. This Court does not have personal jurisdiction over Plaintiffs' claims against Defendant.
7. This Court does not have subject matter jurisdiction over Plaintiffs' claims against Defendant.
8. Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.
9. Defendant is not liable for Plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, see, e.g., N.Y. C.P.L.R. § 1601 et seq.
10. Plaintiffs have waived their claims based on the doctrine disallowing double-recovery.
11. Plaintiffs have waived their claims against Defendant.
12. Plaintiffs have waived their claims based on the collateral source doctrine.
13. Plaintiffs have waived their claims based on the doctrine of equitable subrogation.
14. Plaintiffs have waived their claims based on the doctrine of subrogation.
15. Plaintiffs' claims have been waived to the extent that certain Plaintiffs are seeking recovery against Defendant for the same or similar claims in other civil actions comprising the multi-district entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570), pending in the United States District Court for the Southern District of New York.
16. Plaintiffs' state-law claims are pre-empted by federal law.
17. Plaintiffs' claims are barred by the Act of State doctrine.
18. Plaintiffs' claims are barred based on principles of International Comity.

19. Plaintiffs have released their claims against Defendant.
20. Plaintiffs' claims are barred based on Sovereign Immunity.
21. Defendant is a defunct and dissolved entity which cannot be sued or collected against under state and/or federal law.
22. Plaintiffs' claims are barred by Political Question doctrine.
23. Plaintiffs' claims are barred based on principles of Immunity.
24. Plaintiffs' claims are barred by the doctrine of laches.
25. Plaintiffs' claims have been discharged in bankruptcy.
26. Plaintiffs' claims are barred by the doctrine of election of remedies.
27. Plaintiffs have released their claims against Defendant.
28. Plaintiffs have discharged their claims against Defendant.
29. Plaintiffs' claims are barred by the doctrine of compromise and settlement.
30. Plaintiffs are precluded from asserting their claims by the doctrine of res judicata.
31. Plaintiffs are precluded from asserting their claims by the doctrine of collateral estoppel.
32. Plaintiffs lack standing to pursue their claims against Defendant.
33. Plaintiffs' claims are barred by the statute of limitations.
34. Plaintiffs are estopped from receiving the relief requested against Defendant.
35. Plaintiffs' claims are invalid in light of workers' compensation laws, regulations, rules, and case law.
36. Plaintiffs' claims are barred to the extent that they violate Defendant's right to Due Process.
37. Plaintiffs' claims for punitive damages against Defendant are invalid because Defendant's activities, as alleged by Plaintiffs, were not committed with intent, malice, willful and

outrageous conduct aggravated by evil motive, or reckless indifference, and none of Defendant's activities in any way were intended to, or did harm, the Plaintiffs in this action.

38. In response to Plaintiffs' claims, Defendant intends to invoke all other defenses, including affirmative defenses, that become apparent in the future (including through discovery), and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses at a later point in time.
39. Defendant Sana-Bell, Inc. is a dissolved entity which cannot be sued or recovered from.
40. Defendant Sanabel Al Kheer, Inc. is not a successor in interest or otherwise of Defendant Sana-Bell, Inc.

Respectfully Submitted,

MANNING SOSSAMON PLLC

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*Admitted Pro Hac Vice*

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