

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAYMOND ANTHONY SMITH, as  
Administrator of the Estate of George Eric  
Smith, deceased

Plaintiff,

v.

THE ISLAMIC EMIRATE OF  
AFGHANISTAN, et al.

Defendants.

CASE NO. 01-cv-10132-LAK

**NOTICE OF MOTION FOR TURNOVER OF ASSETS TO THE  
SMITH/SOULAS JUDGMENT CREDITORS FROM GARNISEHEE FEDERAL  
RESERVE BANK OF NEW YORK**

PLEASE TAKE NOTICE that, upon the attached Memorandum of Law, Declaration of James E. Beasley, Jr., Expert Declaration of Jonathan Cristol, Ph.D., and attached/referenced exhibits, the undersigned attorneys for plaintiffs, Raymond Anthony Smith, Administrator of the Estate of George Smith, and Katherine Soulas, Executrix of the Estate of Timothy Soulas shall move this Court, before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, pursuant to the Terrorism Risk Insurance Act, of 2002, Section 201 (Pub. L. No. 107-297, 116 Stat. 2332, Federal Rule of Civil Procedure 69 and New York Civil Practice Law and Rules § 5225 and § 5227, for an Order compelling the Federal Reserve Bank of New York to turn over those assets sufficient to satisfy the Smith/Soulas Judgment Creditors' 14 July 2003 Judgment and associated interest, pursuant to 28 USC §1961 at all relevant times in the possession of the Judgment Defendant The Taliban, including through its agency and instrumentality Da Afghanistan Bank, and for such other relief as the Court deems appropriate.

This Motion and accompanying Memorandum of Law seek a court order directing the turnover of certain funds to the Smith/Soulas Creditors, which is appropriate, necessary, and compelled by the facts, law, and procedural posture of this litigation.

Respectfully submitted,

12 May 2022

**THE BEASLEY FIRM, LLC**

By:

  
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**JAMES E. BEASLEY, JR. (pro hac vice)**  
**DION G. RASSIAS**

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