

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOHN AND JANE DOES D-1, E-1 through E-14, F-1, G-1 through G-4, H-1 through H-3, I-1 through I-9, J-1 through J-6, K-1 through K-8, L-1 through L-2, M-1 through M-2, N-1 through N-3, O-1, P-1 through P-4, Q-1 through Q-3, R-1, S-1 through S-3, T-1 through T-5, U-1 through U-3, V-1 through V-5, W-1 through W-4, X-1, Y-1 through Y-2, Z-1 through Z-4, AA-1 through AA-7, BB-1 through BB-2, CC-1 through CC-6, DD-1, EE-1 through EE-2, AND FF-1 through FF-9, GG-1 through GG-2, HH-1

Plaintiffs,

v.

DEMOCRATIC PEOPLE'S REPUBLIC OF
KOREA Ministry of Foreign Affairs
Jungsong-Dong, Central District, Pyongyang,
Democratic People's Republic of Korea,

Defendant.

CASE NO. 1:23-cv-00273-TJK

OFFER TO ARBITRATE

Plaintiffs in the above-captioned matter, *John and Jane Does D-1, et al., v. Democratic People's Republic of Korea* (Case No. 1:23-cv-00273-TJK), in accordance with 28 U.S.C. § 1605A(a)(2)(A)(iii), hereby offer to submit the matter to arbitration conducted by a third-party organization in accordance with international rules of arbitration. Defendant Democratic People's Republic of Korea may accept this offer to arbitrate within sixty (60) days by (i) notifying in writing the undersigned counsel or (ii) filing a written acceptance with the Clerk of this Court. Should Defendant agree to arbitration, that arbitration shall not require Plaintiffs' absence from the United States. Defendant's failure to comply with the acceptance procedures set forth above shall constitute a rejection of Plaintiffs' offer to arbitrate these claims.

DATED: September 13, 2023

Respectfully submitted,

By: /s/ Mark. N. Bravin

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