

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

CARMEN E. CRESPO, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:22-cv-01514-CKK
)	
DEMOCRATIC PEOPLE’S)	
REPUBLIC OF KOREA,)	
)	
Defendant.)	

NOTICE OF SUIT

Pursuant to 28 U.S.C. § 1608(a) and 22 C.F.R. §93.2, Plaintiffs, Carmen E. Crespo, *et al.*, hereby serve the defendant with the following Notice of Suit and state as follows:

1. **Title of Legal Proceeding:** *Carmen E. Crespo, et al. v. Democratic People’s Republic of Korea*; United States District Court for the District of Columbia; Case No. 1:22-cv-01514
2. **Name of Foreign States Concerned:**
 - Democratic People’s Republic of Korea
3. **Identity of Other Parties:** Plaintiffs: Estate of Carmen E. Crespo-Martinez, Estate of Marciano Crespo-Gonzalez, Estate of Carmen M. Martinez-Camacho, Miguel A. Crespo-Martinez, Jaime L. Crespo-Padilla, Rafael A. Crespo-Padilla, Estate of Virgen M. Flores-Suarez, Estate of Luis Flores-Velez, Estate of Esther M. Suarez-Hernandez, Crucita Flores-Suarez, Estate of Juan Florez-Suarez, Lucina Flores-Suarez, Jose L. Flores-Suarez, Hermes Flores-Suarez, Maria del Carmen Diaz-Flores, Maximino Diaz-Hernandez, Lourdes G. Diaz-Flores, Maximino Diaz-Flores, Estate of Melba A. Diaz-Flores, Ida E. Diaz-Flores, Michael Diaz-Flores, Estate of Lina E. Gonzalez-Arias, Estate of Blanca R. Gonzalez-Hernandez, Estate of Maria A. Hernandez-Jimenez, Nereida Gonzalez-Hernandez, Jose M. Gonzalez-Hernandez, Estate of Benjamin Gonzalez-Hernandez, Estate of Flor M. Gonzalez-Hernandez, Estate of Gustavo Gonzalez-Hernandez, Estate of Jaime Gonzalez-Hernandez, Estate of Luis M. Gonzalez-Hernandez, Estate of Noelia Gonzalez-Hernandez, Estate of Samuel Gonzalez-Hernandez, Estate of Eugenia Lopez-Hernandez, Estate of Hector V. Perez-Lopez, Estate of Miguel E. Martinez-Rivera, Lydia E. Martinez-Villanueva, Estate of Roman E. Martinez-Rosa, Estate of Vasthi Z. Morales-Rodriguez, Jose M. Vega-Franqui, Damaris E. Vega-Morales Vasthi N. Vega-Morales, Estate of Jose M. Otero-Adorno, Estate of Manuel Otero-Feliciano, Francisco R. Otero-Adorno, Blanca I. Otero-Adorno, Juan R. Otero-Adorno, Alicia Otero-Diaz, Luis A. Otero-Diaz, Estate of Juan Padilla-Ortiz, Estate of Petra Ortiz-Ocasio, Victor Padilla-Ortiz, Estate of Pedro Padilla-Ortiz, Elizabeth Padilla-Ortiz, Aida Padilla-Ortiz, Laura Padilla-Ortiz, Sarah

Padilla-Ortiz, Zelideth Padilla-Ortiz, Nelson A. Padilla-Ortiz, Estate of Conscorcía Rodríguez-Acosta, Ismael Negron-Rodríguez, Estate of Joaquín Negron-Rodríguez, Ana María Negron-Rodríguez, Candida R. Negron-Rodríguez, Carmen A. Negron-Rodríguez, Felipe Negron-Rodríguez, Otilio Negron-Rodríguez, David Negron-Rodríguez, Estate of José A. Rodríguez-Zeno, Estate of Rogelio Rodríguez-Roman, Estate of Joaquina Zeno-Centeno, Heriberto Rodríguez-Zeno, Estate of María M. Rodríguez-Zeno, Estate of Mercedes Rodríguez-Zeno, Estate of Mercedes Alejandro-García, Narciso Tavales-García, Estate of Matilda Tavales-García, Edwin Tavales-García, Estate of Luis Conde-Maldonado, Estate of Juanita López-Molleno, Eliezer Conde-López, Estate of Juan Cruz-Candelaria, Estate of Antonia Acevedo-Vila, Estate of Carmen Acevedo-Vila, Estate of Antonio Cruz-Candelaria, Ernesto Delgado-Crespo, Estate of Ernesto Delgado-Linares, Estate of Isabel Crespo-Ferrer, Nilsa E. Delgado-Crespo, Carlos J. Delgado-Crespo, Estate of Manuel González-Ruiz, Estate of Elba Delgado-Mora, Minerva González-Delgado, Carmen N. González-Delgado, Maritza González-Delgado, Nazira E. Hawayek-Figueroa, Estate of José Assed-Hawayek, Estate of Sylvia Figueroa-Rodríguez, José Y. Hawayek-Figueroa, Estate of Pedro Rodríguez-Hernández, Rosa M. Hernández-Ríos, Heriberto Rodríguez-Ríos, Estate of Luz E. Lugos-Quinones, Rosa E. Vázquez-Lugo, Estate of Abigail Lugo-Quinones, Estate of Lydia Lugo-Quinones, Estate of William Lugo-Quinones, Estate of Neftalí Lugo-Quinones, Eva C. Lugo-Quinones, Estate of Luz B. Matos-García, Estate of Carmen M. Matos-García, Ana M. Sánchez-Matos, Estate of Carmen L. Sánchez-Matos, Ángel Rivera-Santiago, Ángel L. Rivera-Cotto, Juan C. Rivera-Cotto, Rosa A. Rivera-Cotto, Estate of Hidelfonso Rivera-Santiago, Estate of Tomás A. Rivera-Santiago, Estate of Juan Rivera-Santiago, Estate of Marcial Rivera-Santiago, Carmen E. Rivera-Santiago, Hipólito Rivera-Santiago, Ana D. Rivera-Santiago, Catalina Rivera-Rivera, Estate of Claire Smith-Golden, Carol Golden, Estate of Ana Sara Vega-González, José Abner Muñoz Vega, Nilda Soler-Rivera, Nilda I. Muñoz-Rivera

4. **Nature of Judicial Documents Served:** A SUMMONS AND COMPLAINT along with this Notice of Suit have been served on you in accordance with the Foreign Sovereign Immunities Act of 1976, Title 28 U.S.C. § 1608 (Pub. L. 94-583; 90 Stat. 2891).
5. **Nature and Purpose of the Proceeding; Relief Requested:** This proceeding is a civil action under 28 U.S.C. § 1605A seeking compensatory and punitive damages arising out of the machine gun and shrapnel grenade terrorist attack at Lod Airport near Tel Aviv, Israel on May 30, 1972.
6. The defendant has been named because it provided material resources and support to the Japanese Red Army, the Popular Front for the Liberation of Palestine, and the Palestine Liberation Organization, for their terrorist operations, including the extrajudicial killing, injury and damage caused to Plaintiffs. Plaintiffs seek no less than \$4,000,000,000.00 in compensatory damages. Plaintiffs also seek punitive damages in an amount to be determined by the Court, pre-judgment interest, post-judgment interest, and their costs expended, for these acts of torture, extrajudicial killing, and injury, and such other and further relief as the Court deems proper.

7. A response to the SUMMONS and COMPLAINT is required to be submitted to the court, not later than 60 days after these documents are received. The response may present jurisdictional defenses (including defenses related to state immunity).
8. The failure to submit a timely response with the court can result in a Default Judgment and a request for execution to satisfy the judgment. If a Default Judgment has been entered, a procedure may be available to vacate or open that judgment.
9. Questions relating to state immunities and to the jurisdiction of the United States courts over foreign states are governed by the Foreign Sovereign Immunities Act of 1976, which appears in §§ 1330, 1391(f), 1441(d), and 1602 through 1611, of Title 28, United States Code (Pub. L. 94-583; 90 Stat. 2891) and is attached to this Notice of Suit.