



United States Department of State

Washington, D.C. 20520

January 22, 2019

Ms. Angela D. Caesar  
Clerk of the Court  
United States District Court  
For the District of Columbia  
333 Constitution Avenue, N.W.  
Washington, D.C. 20001

**Re: Usoyan, et al. v. The Republic of Turkey, 1:18-cv-1141 (CKK)**

Dear Ms. Caesar:

I am writing regarding the Court's request for transmittal of a Summons, Complaint, and Notice of Suit to the Republic of Turkey pursuant to 28 U.S.C. Section 1608(a)(4) as a defendant in the above referenced lawsuit.

The United States Embassy in Ankara, Turkey transmitted these documents to the Ministry of Foreign Affairs of the Republic of Turkey under cover of diplomatic note No. CONS-ACS 18-02008, dated and delivered on December 18, 2018. A certified copy of the diplomatic note is enclosed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jared Hess", written over a horizontal line.

Jared Hess  
Attorney Adviser  
Overseas Citizens Services  
Office of Legal Affairs



*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Handwritten signature or scribble]*

THE DISTRICT COURT OF THE DISTRICT OF COLUMBIA  
CLERK OF COURT  
JAN 23 2019  
11:00 AM  
1000 MARYLAND AVENUE, N.W.  
WASHINGTON, D.C. 20004

**Cc: Steven Perles  
Perles Law Firm PC  
1050 Connecticut Ave. NW, Fifth Floor  
Washington, DC 20036**





*Embassy of the United States of America*

I, Martin Thomen, Consular Officer in Ankara, Turkey certify that this is a true copy of the Embassy of the United States of America, diplomatic note number CONS-ACS 18-02008 dated December 18, 2018, and delivered to the Ministry of Foreign Affairs of Turkey on December, 18, 2018.

Martin Thomen  
Consular Officer



December 18, 2018

No. CONS-ACS 18-02008

The Embassy of the United States of America presents its compliments to the Ministry of Foreign Affairs of the Republic of Turkey, and has the honor to request the assistance of the Ministry in the following matter.

The Embassy of the United States of America refers the Ministry of Foreign Affairs of the Republic of Turkey to the lawsuit *Usoyan, et al. v. The Republic of Turkey*, 1:18-cv-1141 (CKK), which is pending in the U.S. District Court for the District of Columbia. The Republic of Turkey is a defendant in this case. The Embassy transmits a Summons and Complaint herewith. The U.S. District Court for the District of Columbia has requested service of these documents. This note constitutes transmittal of these documents to the Government of the Republic of Turkey as contemplated in Title 28, United States Code, Section 1608(a)(4).

Under applicable U.S. law a defendant in a lawsuit must file an answer to the Complaint or some other responsive pleading within 60 days of the date of transmittal of the Complaint, in this case the date of this note. Failing to do so, a defendant risks the possibility of having judgment entered against it without the opportunity to present arguments or



evidence on its behalf. Therefore, the Embassy requests that the enclosed Summons and Complaint be forwarded to the appropriate authority of the Republic of Turkey with a view towards taking whatever steps are necessary to avoid a default judgment.

In addition to the Summons and Complaint, the Embassy is enclosing a Notice of Suit prepared by the plaintiff, which summarizes the nature of the case and includes references to pertinent U.S. laws concerning suits against foreign States.

Under U.S. law any jurisdictional or other defense including claims of sovereign immunity must be addressed to the court before which the matter is pending, for which reason it is advisable to consult an attorney in the United States. It is the practice of the U.S. Department of State to be available to discuss the requirements of U.S. law with counsel. The U.S. Government is not a party to this case and cannot represent other parties in this matter.

The Embassy of the United States of America avails itself of this opportunity to renew to the Ministry of Foreign Affairs the assurances of its highest consideration.

Embassy of the United States of America,

Ankara, December 18, 2018





Enclosed:

1. Summons, Complaint, and Notice of Suit
2. Translations