

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

JUANA DOE I individually and as representative of her deceased husband, JUAN DOE I;
JUANA DOE II individually and as representative of her deceased husband, JUAN DOE II;
JUANA DOE III individually and as representative of her deceased husband, JUAN DOE III;
JUANA DOE IV individually and as representative of her deceased husband, JUAN DOE IV;
JUANA DOE V individually and as representative of her deceased husband, JUAN DOE V;
JUAN DOE VI; JUANA DOE VI in her individual capacity; JUAN DOE VII individually and as representative of his deceased father, JUAN DOE XVIII; JUAN DOE VIII; JUAN DOE IX in his individual capacity and on behalf of all others similarly situated, and on behalf of his minor daughter, JUANA DOE VIII; JUAN DOE X; JUAN DOE XII; JUAN DOE XIII individually and on behalf of all others similarly situated; JUAN DOE XIV; JUAN DOE XVI individually and as representative of his deceased father, JUAN DOE XV; JUAN DOE XVII and on behalf of all others similarly situated,

Plaintiffs

v.

IFC ASSET MANAGEMENT COMPANY, LLC
2121 Pennsylvania Ave, NW
Washington, D.C., 20433

Defendant

Civil Action No. _____.

**PLAINTIFFS' MOTION FOR
LEAVE TO PROCEED IN
PSEUDONYM**

Plaintiffs, Juana Doe *et al*, by and through their counsel, hereby apply for leave to file their complaint under Doe pseudonyms. Plaintiffs request to use a pseudonym in the caption of the complaint, and to list Plaintiffs' counsel's address as the address for the Plaintiffs in the Court's records. As set forth in greater detail in the accompanying memorandum, this matter involves highly sensitive allegations of murder and other physical abuse of Plaintiffs and their decedents in one of the most dangerous regions of one of the most dangerous countries in the world – the Bajo Aguán, Honduras. Plaintiff have reasonable and credible fears that, if their identities were used in connection with this lawsuit, Plaintiffs as well as their family members would face violent and life-threatening acts of retaliation.¹ In support of this motion, plaintiffs rely on the accompanying memorandum and the Declaration of Juliana Bird and Exhibits, filed herewith.

For these reasons and such other reasons as may appear just to the Court, Plaintiffs request that their motion for leave to file the Complaint under pseudonyms be granted.

Dated: October 24, 2017

Respectfully submitted,

/s/Misty A. Seemans

Misty A. Seemans, DE Bar # 5975

O.P.D. (Pro Bono; cooperating attorney with
EarthRights International)

820 North French Street

Third Floor

Wilmington, DE 19801

Tel: (302) 577-5126

Email: misty@earthrights.org

Marissa Vahlsing, *pro hac vice pending*

marissa@earthrights.org

Marco Simons, *pro hac vice pending*

marco@earthrights.org

¹ Should the Court so desire, Plaintiffs are prepared to file under seal an affidavit containing the true identities of all named plaintiffs and plaintiff decedents.

Rick Herz, *pro hac vice pending*
rick@earthrights.org
Sean Powers, *pro hac vice pending*
sean@earthrights.org
EARTHRIGHTS INTERNATIONAL
1612 K Street NW, Suite 401
Washington, D.C., 20006
Tel: (202) 466-5188

Jonathan Kaufman, *pro hac vice pending*
LAW OFFICE OF JONATHAN KAUFMAN
341 W. 24th St. Apt. 21C
New York, NY 10011
T: (212) 620-4171

Judith Brown Chomsky, *pro hac vice pending*
LAW OFFICES OF JUDITH BROWN CHOMSKY
Post Office Box 29726
Elkins Park, PA 19027
Tel: 215-782-8367

Jose Luis Fuentes, *pro hac vice pending*
Law Office of Jose Luis Fuentes
2625 Alcatraz Ave, #213
Berkeley, CA 94705
(213) 500-2500
jlflaw@att.net

Counsel for Plaintiffs