IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Estate of Malka "Malki" Roth et al., *Plaintiffs*, v. Al-Tamimi, *Defendant*.	Civil Action No. 1:26-cv-02836-RCL

Plaintiffs' Request for Clerk to Enter Default Against Defendant

Plaintiffs, by their undersigned attorneys, hereby request that the Clerk of Court enter a default by Defendant Ahlam Aref Ahmad Al-Tamimi for her failure to timely respond to the Summons and Complaint served on Defendant on November 3, 2026. Plaintiffs, through their attorneys, certify the following:

1) This action was commenced on August 11, 2026, by filing of the Complaint. ECF 1.
2) The Court granted Plaintiffs' motion for alternative service on November 2, 2026. ECF 14.
3) Defendant was served with the Summons and Complaint on November 3, 2026, in a manner that comports with the Court's Order.
4) Proof of service was filed on November 4, 2026. ECF 15.
5) Defendant's answer was due on November 24, 2026. ECF 16.
6) No answer or reply by Defendant has been filed on the docket, nor have Plaintiffs received any answer or reply by Defendant.
7) Defendant is in default, and on this basis, Plaintiffs respectfully request that the Clerk enter a default by Defendant in accordance with the Federal Rule of Civil Procedure 55(a).

8) Plaintiffs attach hereto their Affidavit in Support of Default as Exhibit 1, and the Military Affidavit as Exhibit 2.

Dated: November 25, 2026

Respectfully Submitted,
/s/ *David I. Schoen*

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EXHIBIT 1

CO 538
Rev. 5/2020

UNITED STATES DISTRICT AND BANKRUPTCY COURTS FOR THE DISTRICT OF COLUMBIA

THE ESTATE OF MALKA "MALKI" ROTH, et al.
Plaintiff(s)

vs.

Civil Action No. 1:26-cv-02836-RCL

AHLAM AREF AHMAD AL-TAMIMI
Defendant(s)

AFFIDAVIT IN SUPPORT OF DEFAULT

I hereby certify under penalty of perjury, this 25 day of November, 2026, that I am the attorney of record for the plaintiff in the above-entitled case; that the defendant(s) AHLAM AREF AHMAD AL-TAMIMI was [were] (select one):

☐ personally served with process on _____.

☐ served via registered or certified mail pursuant to provisions of Rule 4(C) of the Superior Court of the District of Columbia on (date the return receipt was signed by addressee): _____.

☐ served via First Class Mail pursuant to provisions of Rule 4(C) of the Federal Rules of Civil Procedure on (date the Acknowledgment Form was signed by addressee): _____.

☒ The authority for obtaining personal jurisdiction over the defendant served outside the District of Columbia is: established pursuant to service effectuated on 11/3/2026, in compliance with Court order, ECF 14.

I further certify under penalty of perjury that: no appearance has been entered by said defendant(s) in this case; no pleading has been filed and none served upon the attorney for the plaintiff(s); (select one)

☒ no extension has been given and the time for filing has expired

☐ although an extension has been given, the time for filing has expired;

and the defendant is neither an infant nor an incompetent person.

The Clerk is requested to enter a Default against said defendant(s).

/s/ David I. Schoen
Attorney for Plaintiff(s) [signature]

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Name, Address and Telephone Number

391408
Bar Id. Number

GENERAL INFORMATION

- All affidavits must be typed and filed electronically using the CM/ECF system. In the event the filer experiences technical difficulties, a PDF version of the affidavit may be emailed to dcd_cmecf@dcd.uscourts.gov.
- If default is being requested for a company, corporation or other business entity, only the Affidavit in Support of Default should be filed. If the defendant is a person, the Military Affidavit must be submitted in addition to the Affidavit in Support of Default.
- The Clerk's Office will fill out a default form and file it electronically, therefore it is not necessary to submit a proposed default form at the time the affidavit is filed.
- If service was effected outside the District of Columbia, pursuant to the Long-Arm Statute, D.C., the sub-section that applies to this case must be cited along with the cite for the Long-Arm Statute.
- If service was made on a domestic or foreign corporation or upon a partnership or other unincorporated association, the return of service must show in which capacity the individual served accepted service. (Officer, Managing or General Agent, or any other agent authorized to receive process)
- If the return postal receipt is not signed by the party named in the summons, the affidavit of service must give specific facts from which the Court can determine that the person who signed the receipt meets the appropriate qualifications for receipt of process as set forth in Rule 4(d) of the Superior Court for the District of Columbia.
- If the judgment is based upon a promissory note, the original note must be submitted along with the request for default/judgment.
- If the Complaint is based upon a breach of contract, a promissory note or for an ascertainable sum, the Clerk can enter default/judgment if it is for all the claims and all the parties.
- Affidavits must be signed by plaintiff's attorney.
- The amount in the affidavit for default/judgment cannot exceed the amount prayed for in the complaint.
- If the request for default or default/judgment is for more than one party and the forms supplied by the Clerk do not contain enough space to accommodate all this information, Counsel should draft his/her own forms, tracking the language contained in the Clerk's Office forms.

EXHIBIT 2

CO 547
Rev. 3/2010

UNITED STATES DISTRICT AND BANKRUPTCY COURTS FOR THE DISTRICT OF COLUMBIA

THE ESTATE OF MALKA "MALKI" ROTH, et al.
Plaintiff(s)

vs.

AHLAM AREF AHMAD AL-TAMIMI
Defendant(s)

Civil Action No. 1:26-cv-02836-RCL
In re:
(Defendant)

MILITARY AFFIDAVIT

(Certificate in Compliance With Soldiers and Sailors Civil Relief Act of 1940, As Amended in 1942 & 1960 Title 50, Appendix, Section 520, United States Code)

I hereby certify under penalty of perjury, this 25 day of November, 2026, that (select one):

☒ I am the duly authorized agent of the plaintiff in the above-listed case and make this certificate on plaintiff's behalf.

☐ I am the plaintiff in the above-entitled case.

I make this certificate pursuant to the provisions of the Soldiers and Sailors Civil Act of 1940 and the provisions of the Soldiers and Sailors Civil Relief Act Amendments of 1942 and 1960; that on behalf of the plaintiff, I have caused careful investigation to be made to ascertain whether or not the above-named defendant is in the military service of the United States or its Allies and that as a result of said investigation, I have discovered and do hereby allege that said defendant is not in the military service of the United States or its Allies, that is to say said defendant is not a member of the Army of the United States, the United States Navy, the Marine Corps, the Coast Guard and is not an officer of the public Health Service detailed by proper authority for duty either with the Army or Navy, and said defendant is not on active duty with any branches aforesaid, nor is said defendant under training or education under the supervision of the United States preliminary to induction in to the military services; and the defendant is not serving with the forces of any nation with which the United States is allied in the prosecution of any war, nor has said defendant been ordered to report for induction under the Selective Training and Service Act of 1940, as amended, nor is the defendant a member of the Enlisted Reserve Corps ordered to report for military service, but is employed as a _____.

/s/ David I. Schoen
Attorney for Plaintiff(s) [signature]

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