

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
- Alexandria Division -**

Case No. 1:09-cv-615

**ESTATE OF RAHEEM KHALAF
SA'ADOON,
WIJDAN MOHSIN SAED,
SAJJAD RAHEEM KHALAF,
ALI RAHEEM KHALAF**

Plaintiffs

v.

ERIK PRINCE, et al.,

Defendants

MOTION FOR APPROVAL OF SETTLEMENT TERMS

J. Walker Richmond III, Administrator of the Estate of Raheem Khalaf Sa'adoon, represents that:

1. On or about December 24, 2006, Raheem Khalaf Sa'adoon died from injuries as a result of an incident allegedly involving Andrew Moonen. Century-National Insurance Company provided homeowners insurance coverage to Andrew Moonen and Century-National Insurance Company, without admitting any liability or negligence on the part of Andrew Moonen, but distinctly denying such liability, has offered to compromise the claim for injuries of Raheem Khalaf Sa'adoon, deceased, for a sum certain.

2. An offer of compromise has been negotiated on behalf of Wijdan Mohsin Saed, Sajjad Raheem Khalaf, and Ali Raheem Khalaf, by Burke O'Neil LLC, who have represented and continue to represent the interests of Wijdan Mohsin Saed, Sajjad Raheem Khalaf, and Ali Raheem Khalaf.

3. In reliance on Burke O'Neil LLC's representations that it represents the interests of Wijdan Mohsin Saed, Sajjad Raheem Khalaf, and Ali Raheem Khalaf and that there are no other individuals entitled to assets of the Estate, and in further reliance on a Declaration of Wijdan Mohsin Saed attached hereto as Exhibit A and incorporated herein by reference, I pray that the offer of compromise be approved and that I be permitted to distribute any proceeds from the offer of compromise which accrue to the Estate of Raheem Khalaf Sa'adoon for the benefit of Wijdan Mohsin Saed, Sajjad Raheem Khalaf, and Ali Raheem Khalaf.

The terms of this settlement are available to the Court and can be provided under seal, upon the Court's request.

J. Walker Richmond III, Administrator of the
ESTATE OF RAHEEM KHALAF SA'ADOON

/s/

Susan L. Burke (VA Bar #27769)
William F. Gould (VA Bar #67002)
Counsel for Plaintiff
BURKE O'NEIL LLC
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202.445.1409
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Peter H. White (Va. No. 32310)
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/s/
Susan L. Burke (VA Bar #27769)
William F. Gould (VA Bar #67002)
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IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

_____)	CIVIL ACTION
Estate of Raheem Khalaf Sa'adoon et al.)	
v.)	NO. 1 :09 cv 615 TSE
)	
)	CIVIL COMPLAINT
Erik Prince et al.)	JURY DEMAND
Defendants)	
_____)	

DECLARATION OF WIJDAN MOHSIN SAED

I, Wijdan Mohsin Saed, hereby declare the following under penalty of perjury:

1. My name is Wijdan Mohsin Saed. I was married to Raheem Khalaf Sa'adoon until his death.
2. I am the mother of Sajjad Raheem Khalaf (11 years old) and Ali Raheem Khalaf (8 years old), the only children of Raheem Khalaf Sa'adoon.
3. I am aware that Mr. Moonen has agreed to pay compensation for the death of my husband. This compensation will be used to support my children and me, the only persons who were financially dependent on Raheem Khalaf Sa'adoon at the time of his death.
4. We consent to the terms that Mr. Moonen has proposed.
5. This declaration has been read to me in Arabic by Dr. Majid Jumoor.



"Wijdan Mohsin Saed" – Widow
Wife of Raheem Khalaf Sa'adoon, Deceased
Mother of Sajjad Raheem Khalaf and Ali Raheem Khalaf Sa'adoon

August 27, 2009