

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

Leffer, et al.

Plaintiffs,

v.

Federal Republic of Germany, et al.

Defendants.

Case No. 19-cv-3529 (CJN)

**DEFENDANT'S OPPOSITION TO PLAINTIFFS'
MOTION FOR ENFORCEABLE DEED**

Defendant the Federal Republic of Germany opposes Plaintiffs' Motion for an Enforceable Deed to be levied on the business property of the Alabama based subsidiary of a German car part manufacturer who is not a party in this matter as premature since the Court has not yet ruled on the Federal Republic of Germany's pending Motion to quash Service. Plaintiffs' Application is furthermore inappropriate, because it asks the Court to issue a levy against an entity that is not a party to this lawsuit. Lastly, and most importantly, the Court should not permit the Plaintiffs to continue to file vexatious motions that have no legal basis.

The Federal Republic of Germany's opposition should not be construed as a waiver under the Foreign Sovereign Immunities Act or of its pending motion to quash.

Dated: June 10, 2020

Respectfully submitted,

s/ Jeffrey Harris

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic Filing.

s/ Jeffrey Harris

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