No. 24-856

IN THE

Supreme Court of the United States

CISCO SYSTEMS, INC., *et al.*,

Petitioners,

v.

DOE I, *et al.*

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

BRIEF OF ESTATE OF TAMAR KEDEM SIMAN TOV, *ET AL.* AS *AMICI CURIAE* IN SUPPORT OF THE RESPONDENTS

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March 27, 2026

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INTEREST OF *AMICI CURIAE*

Estate of Tamar Kedem Siman Tov et al. (collectively, the "October 7 Plaintiffs") are 101 victims, or estates of murdered victims, of the October 7, 2023, Hamas terror attack on Israel.[1] They are the plaintiffs in an action brought in the Southern District of New York, No. 24-cv-4765, in which they assert tort claims with subject-matter jurisdiction based on the Alien Tort Statute ("ATS"), 28 U.S.C. § 1350, against a supposed international humanitarian organization and its current and former senior officials who, as set forth in their complaint's detailed factual allegations, aided and abetted Hamas' torts for over a decade prior to that attack by providing it in multiple ways with material assistance in building up the terror infrastructure in Gaza that made the attack possible.[2] Their case is currently on appeal in the Second

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[1] The names of all of the October 7 Plaintiffs filing as amici herein are set forth in Attachment A. No counsel for a party authored this brief in whole or in part; and no party, party's counsel, or other person or entity other than the October 7 Plaintiffs and their counsel contributed money that was intended to fund the preparation or submission of this brief.

[2] Their complaint sets forth at length the nexus between the defendants' aiding and abetting and New York, which satisfies this Court's ruling in *Kiobel v. Royal Dutch Petroleum Co.*, 569 U.S. 108 (2013), against extraterritorial application of the ATS. Briefly, their complaint alleges that defendants solicited and collected substantially all of the donations they then used to knowingly provide material assistance to Hamas in New York, and the funds were then transmitted to Gaza in aid of Hamas from bank accounts in New York.

Circuit (as No. 25-2837) due to threshold non-merits immunity defenses raised by the defendants, but as and when the Second Circuit rejects those immunity defenses, the October 7 Plaintiffs wish to be able to litigate the merits of their aiding-and-abetting claims under the ATS.[3] The October 7 Plaintiffs have no insight as to whether the respondents in this case will ultimately be able to substantiate the factual allegations on which their aiding-and-abetting claims rest, or to overcome the various defenses that may be raised other than the sweeping assertion that no aiding-and-abetting claim should ever be available to any plaintiff in any ATS case. But respondents should have a fair chance to try to prove their case.

SUMMARY OF ARGUMENT

Almost 130 years ago, future Chief Justice Taft wrote that "[f]rom the earliest times, all who take part in a trespass, either by actual participation therein or by aiding and abetting it, have been held to be jointly and severally liable for the injury inflicted." *Thomson-Houston Electric Co. v. Ohio Brass Co.*, 80 F. 712, 721 (C.C.A. 6th Cir. 1897). He made this

[3] Certain of the October 7 Plaintiffs have also brought aiding-and-abetting claims against certain of the defendants in that action under the Torture Victim Protection Act ("TVPA"), Pub.-L. 102-256, 28 U.S.C. § 1350 note. We endorse respondents' arguments on the separate TVPA issue the Court is considering, but limit the substance of this submission to the ATS issue, because we believe it is on that issue that we have points not already brought to the attention of the Court by the parties that may be relevant and helpful.

statement in the context of rejecting a reading of precedent that would have been "a somewhat starting departure from previously understood principles in the law of torts." *Ibid.* Respondents here have shown in their merits brief ("Resp. Br.") that liability for aiders and abettors is well-established for "tort[s] . . . committed in violation of the law of nations" and that the ATS thus provides subject matter jurisdiction over civil actions by aliens for such claims even when there is no diversity jurisdiction. No surreptitious judicial legislation is needed here to "create" any novel cause of action, and all this Court need do is continue to recognize the ATS as a jurisdictional statute, and thus refuse to narrow it to prohibit jurisdiction over the present action that petitioner Cisco Systems, Inc. ("Cisco") claims is ill-founded on atextual policy grounds.

Cisco essentially concedes in its own merits brief ("Pet. Br.") that its real concern is not with the abstract availability of aiding and abetting liability under the ATS in general, by arguing (Pet. Br. at 36-39, emphasis added) that "[a]t a minimum, respondents' *particular* aiding and abetting claims are not cognizable." But the points made in that section of their brief do not address the sweeping all-or-nothing question on which certiorari was granted and, as shown below, Cisco has other legal doctrines available to it to defend against liability in this case that do directly deal with the supposed defects in respondents' "particular" claims that Cisco raises.

Specifically, the supposed foreign policy concerns raised by the dissenters below and pursued by Cisco and its supporters are case-specific and driven by the fact that the alleged primary tortfeasor here (the People's Republic of China, together with various of its officials) happens to be a foreign sovereign with which the U.S. has a complex relationship. But nothing about ATS litigation in general makes it inevitable or even typical that the primary tortfeasor in an aiding-and-abetting case will be a foreign sovereign, and other sorts of primary tortfeasors will simply not give rise to the supposed concerns raised here. The well-established act of state doctrine, by contrast, is directly applicable to any case, but only a case, in which a plaintiff cannot prevail without showing that an "official act" of a recognized foreign government carried out in its own territory was "invalid." There may be plausible arguments both ways about whether the act of state doctrine provides a valid defense for Cisco here on remand, but that doctrine already takes appropriate account of the concerns that have been raised, which cannot justify eliminating aiding-and-abetting liability in the broader range of potential ATS cases where those concerns are not relevant.

Similarly, Cisco's claim that it ought not be subject to tort liability for human rights abuses aided and abetted by its sale of controversial products to the Chinese government, given its claimed full compliance with all relevant federal law regulating such sales, is case-specific. Moreover, it is clearly a disguised preemption claim, and Cisco remains free to raise it on remand as an explicit preemption claim to

the extent it is valid in that context. Again, these concerns cannot justify eliminating aiding-and-abetting liability in the broader range of potential ATS cases where those concerns are not relevant.

Indeed, Cisco has numerous other potential defenses available to it, including whether plaintiffs can establish the required state of mind for aiding-and-abetting liability, whether plaintiffs can establish proximate cause, and whether all of the various torts "in violation of the law of nations" that the complaint alleges are viable under *Sosa v. Alvarez-Machain*, 542 U.S. 692 (2004). No basis has been shown for eliminating aiding-and-abetting liability in all ATS cases simply to excuse Cisco from the need to prove any of these substantive defenses to liability, thereby unfairly precluding plaintiffs from the chance to overcome them with appropriate arguments and evidence. The Court should affirm.

ARGUMENT

I. The Purported "Foreign Policy" Concerns Raised by Cisco, Its Amici, and the Dissent(s) Below Are No Basis for Eliminating Aiding-and Abetting Liability in All ATS Cases

a. Nothing About ATS Litigation Makes It Necessary or Typical that the Primary Tortfeasor in an Aiding-and-Abetting Case Be a Foreign Sovereign

Judge Christen's dissent in the Ninth Circuit in this case worried that (at 89a in the version of the opinion submitted with the cert. petition):

> Holding Cisco liable in this case would not directly impose liability on the Chinese government for its conduct with respect to its own nationals, but a finding of liability in this case would necessarily require a showing that the Chinese Communist Party and Ministry of Public Security violated international law with respect to the Chinese-national Plaintiffs. Such a finding could have serious ramifications for Sino-American relations, fraught as they already are.

The same point was raised by the dissent from the denial of rehearing en banc in the Ninth Circuit. 131a. Petitioners (Pet. Br at 37-38) and their amici repeatedly echo this theme as well. But this concern is no basis for barring aiding-and-abetting

claims in *all* ATS actions, because it is case-specific. Nothing about aiding-and-abetting claims under the ATS presupposes that the primary tortfeasor will be a foreign sovereign with "fraught" relations with the U.S., or the individual officials of such a sovereign, although that happens to be the situation alleged in this particular case. But pirates—the prototypical 18th-century example of tortfeasors under the law of nations—are more or less by definition non-state actors, and it would make no sense at all to say that evidence in an aiding-and-abetting case establishing that the non-party pirates had in fact committed the underlying act of piracy "could have serious ramifications" for U.S. foreign policy vis-à-vis pirates. *See* Resp. Br. at 14-15, 17 (discussing early history of liability for aiding and abetting piracy and similar wrongs).

Similarly, this Court has recounted the historical background to the 1790 enactment of the ATS as driven in part "by the so-called Marbois incident of May 1784, in which a French adventurer, Longchamps, verbally and physically assaulted the Secretary of the French [embassy] in Philadelphia." *Sosa*, 584 U.S. at 716. Longchamps was not a state actor, and those who commit that same international tort today are generally not state actors. For example, the defendant now facing criminal charges for the 2025 murders of two staff members of the Israeli Embassy to the U.S. is a private individual. *See United States v. Rodriguez*, D.D.C. No. 1:25-cr-224 (superseding indictment dated February 4, 2026). And the gunmen who committed the same long-recognized interna-

tional tort in a very high-profile incident in 1980 by seizing the Iranian Embassy in London and taking hostages were non-state actors affiliated with a dissident militant group. *https://en.wikipedia.org/wiki/Iranian_Embassy_siege*. Similarly, in the October 7 Plaintiffs' case, the primary tortfeasor is Hamas, and there are likewise no plausible grounds for worrying that U.S. foreign policy would be hampered by evidence at trial establishing that Hamas had in fact committed genocide and other torts in violation of the law of nations.

It may be true that torture, as one specific tort in violation of the law of nations, requires a state actor, absent which the same wrongful actions would only constitute a crime and tort under relevant national law. Certainly the statutory cause of action for torture established by the TVPA requires (in that statute's section 2(a)) that the alleged torturer have acted "under actual or apparent authority, or color of law, of any foreign nation."[4] But that again is a case-specific issue not presented by other aiding and abetting claims with jurisdiction premised on the ATS where the underlying tort in violation of the law of nations is different. Even genocide, as alleged by the

[4] There is some TVPA case law accepting that an armed group not internationally recognized as a sovereign government may qualify as a "foreign nation" for this purpose under appropriate circumstances. *See*, *e.g.*, *Doe v. Islamic Salvation Front*, 993 F. Supp. 3 (D.D.C. 1998) (faction in de facto control of significant portion of Algerian territory during civil war could potentially be "foreign nation" for TVPA purposes even though it was not the recognized government of Algeria).

October 7 Plaintiffs, can be committed by terrorist groups and armed factions that no one treats as sovereign governments with the rights of sovereign governments.

Finally, the claim that Cisco is being sued as a "surrogate defendant[ ]" in lieu of the Chinese government itself (Pet Br. at 37) is nothing more than an argument against aiding and abetting liability in any tort case whatsoever. Any plaintiff's lawyer will typically only bother to pursue aiders and abettors in lieu of suing the primary tortfeasor (thereby adding additional burdens of proof and hurdles to success at trial) when there are likely to be difficulties in obtaining jurisdiction over the primary tortfeasor or in collecting a judgment against the primary tortfeasor. Defendants sued in such cases no doubt may resent the absence from the caption of the primary tortfeasor, especially where the same risks identified by plaintiff's counsel may make a contribution or indemnification claim against the primary tortfeasor of limited practical value. But what they are unhappy about is the natural consequence of the basic principles of tort law established, as then-Judge Taft said in 1897, "[f]rom the earliest times." *Thomson-Houston*, 80 F. at 721.

b. Any Foreign Policy Concerns in an Aiding-and-Abetting Case Like This One Where the Primary Tortfeasor Does Happen to Be a Foreign Sovereign Are Already Appropriately Addressed by the Act of State Doctrine

To the extent the plaintiffs' claims against Cisco here would require proof at trial of the underlying primary torts by the Chinese government or its officials, an entirely separate doctrine already addresses the foreign-policy concerns that might raise. As the Court put it in *Banco Nacional de Cuba v. Sabbatino*, 376 U.S. 398, 401 (1964), "[t]he act of state doctrine in its traditional formulation precludes the courts of this country from inquiring into the validity of the public acts [of] a recognized foreign sovereign committed within its own territory." En route to ruling that Cuba's alleged wrongdoing in that situation was non-justiciable, the Court also quoted (*id.* at 416), Chief Justice Fuller's classic explanation in *Underhill v. Fernandez*, 168 U.S. 250, 252 (1897), that "the courts of one country will not sit in judgment on the acts of the government of another, done within its own territory," thereby leaving any potential remedies for such wrongful acts to political or diplomatic means rather than to the court system. *See also Samantar v. Yousuf*, 560 U.S. 305, 322 (2010) (suggesting that act of state doctrine also applies to individual liability of a foreign government official "for acts taken in his official capacity").

However, that trial evidence in a given case will likely tend to portray a non-party foreign government in an unflattering light is not, itself, grounds for a non-sovereign defendant to get the case dismissed under the act of state doctrine. *W.S. Kirkpatrick & Co., Inc. v. Environmental Tectonics Corp.*, 493 U.S. 400 (1990). In that case, the plaintiff was an unsuccessful bidder for a government contract in Nigeria who sued competitors who had allegedly obtained the contract via bribery of Nigerian officials. This Court unanimously rejected the applicability of the act of state doctrine, because it did not appear that plaintiff would need to prove at trial that the award of the contract to the alleged bribers was invalid as a matter of Nigerian law. This Court held (493 U.S. at 409) that there is no basis for the U.S. courts avoiding "cases or controversies properly presented to them" merely because "they may embarrass foreign governments," but it remains the law that "in the process of deciding" any such case "the acts of foreign sovereigns taken within their own jurisdictions shall be deemed valid." The possibility of public airing in a U.S. courtroom of evidence suggesting that some Nigerian officials were corrupt raised essentially identical foreign policy concerns to those that might be raised here by trial evidence suggesting that some Chinese officials are torturers, but the Court found such concerns an insufficient ground to find an atextual limitation on the subject matter jurisdiction of the lower courts.

Cisco remains free on remand to raise the argument that the act of state doctrine should protect it

from liability here because (a) the alleged abuse and torture of the plaintiffs should be considered official acts of the Chinese government on Chinese territory; which (b) the U.S. courts cannot find tortious without finding "invalid," which they may not do; which thus (c) would preclude plaintiffs from establishing a key element of their aiding-and-abetting claims. We note that the Second Circuit has rejected essentially this argument in *Kashef v. BNP Paribas S.A.*, 925 F.3d 53 (2d Cir. 2019), which was not technically an ATS case although its substantive allegations resemble this one.[5] In that case, the defendants were Western financial institutions that had allegedly aided and abetted genocidal atrocities committed by the government of Sudan by helping that government evade U.S. sanctions. The Second Circuit held that (*id.* at 60, 61) "a universal international consensus prohibit[s] us from deeming genocide an 'official act' of Sudan" and that "[w]e are prohibited from deeming valid, for purposes of act-of-state deference, atrocities such as genocide, mass rape, and ethnic cleansing, which violate jus cogens norms."

On remand, the plaintiffs will be free to argue that the lower courts should reject any act of state defense based on the reasoning of *Kashef*, while Cisco in turn will be free to argue either that the facts alleged here are distinguishable from those alleged in *Kashef*, or

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[5] Subject matter jurisdiction in that case was not based on the ATS but on diversity jurisdiction, under the special rules applicable to certain class actions set forth in 28 U.S.C. §1332(d).

that the Ninth Circuit should not follow the Second Circuit. This Court need not and should not prejudge those issues, which are not presently before it, but need only recognize that the act of state doctrine is the more appropriate context to address any supposed foreign policy concerns raised by the claims against Cisco. Eliminating the long-recognized availability of aiding-and-abetting liability as a general matter under the ATS is not the appropriate solution to those concerns.

Moreover, *Kiobel*'s holding rejecting extraterritorial application of the ATS was very sensitive to avoiding the foreign policy embarrassments that opening U.S. courts to purely extraterritorial torts might raise. 569 U.S. at 119-120. There is no sound basis for the Court to now go any further than that. The district court here held that *Kiobel* barred ATS claims against all the defendants, but the Ninth Circuit reversed that holding as to Cisco only, because Cisco's alleged culpable actions were sufficiently alleged to have taken place in California not in China. Appendix to Cert. Petition 2a, 63a. Cisco does not challenge that ruling here.

II. Cisco's Contention That It Fully Complied with Federal Export Regulations Should Be Raised on Remand Either as a Preemption Defense or as a Fact-Based Defense to Plaintiffs' Factual Allegations

Cisco claims (Pet. Br. at 38) that it would be "troubling" to allow the aiding and abetting claims to pro-

ceed "because Cisco's sales of software and technology to China were in compliance with American export controls and consistent with relevant policies in place in the late 1990s and early 2000s." At one point (Pet. Br. at 9-10) it sounds as if the truth of this assertion may depend on the truth of Cisco's denials of the complaint's factual allegations. Aiding and abetting claims based on well-pleaded allegations in the pleadings that are subsequently disproven by actual evidence should of course be rejected at the appropriate procedural point, whether at summary judgment or at trial. But that cannot provide a basis for the Court to reverse the Ninth Circuit's decision that the claims against Cisco are viable at the pleading stage. To the extent that may be a misinterpretation of what Cisco is arguing, Cisco is free to make a preemption argument on remand based on its asserted full compliance with federal regulation of technology exports to China.

Such arguments are routinely considered by this Court. Just this Term, the Court is considering whether 49 U.S.C. § 14501(c) preempts certain common-law claims for negligent selection of a motor carrier or driver in *Montgomery v. Caribe Transport II, LLC*, No. 24-1238. And the Court is separately considering whether the Federal Insecticide, Fungicide, and Rodenticide Act preempts certain common-law failure-to-warn claims in *Monsanto Co. v. Durnell*, No. 24-1068. The October 7 Plaintiffs take no position on whether the federal export laws and regulations Cisco claims to have fully complied with could form the basis for a colorable preemption defense here, but

there is certainly no obvious reason why a federal law that did preempt common-law tort claims would not likewise preempt non-statutory claims for torts in violation of the law of nations. *Cf. Diggs v. Schultz*, 470 F.2d 461 (D.C. Cir. 1972) (Congressional statute explicitly authorizing importation of metallic chromite from Southern Rhodesia prevailed over binding Security Council resolution requiring U.S. to impose embargo on trade with Southern Rhodesia). But, again, eliminating the long-recognized availability of aiding-and-abetting liability as a general matter under the ATS is not the appropriate solution to these concerns.

III. Cisco Can Invoke Other Appropriate Defenses to Aiding and Abetting Liability on Remand

And Cisco will have multiple additional defenses to these "particular" aiding-and-abetting claims against it on remand. First, the question on which this Court granted certiorari assumes for present purposes that the complaint alleges one or more torts in violation of the law of nations that are valid under *Sosa*. But the amicus brief of CACI Premier Technology, Inc. ignores that limitation and forthrightly argues for *Sosa* to be overruled. It is certainly implausible to say that torture, as such, is not a tort in violation of the law of nations recognized by *Sosa*, given *Sosa*'s favorable quotation of the Second Circuit's famous statement that " '[F]or purposes of civil liability, the torturer has become–like the pirate and slave trader before him–hostis humani generis, an enemy of all mankind.' " 542 U.S. at 732 (quoting *Filartiga v. Pena-Irala*, 630

F.2d 876, 890 (2d Cir. 1980)). But plaintiffs' Third Amended Complaint here alleges seven different causes of action for a wide range of different alleged torts in violation of the law of nations, not only torture as such, but cruel, inhuman or degrading treatment, forced labor, prolonged and arbitrary detention, extrajudicial killing, enforced disappearance, and a catch-all "crimes against humanity" tort that includes such particulars as forced exile, forcible transfer, and persecution.

While all of these sound barbaric as well as unconstitutional if committed by a government in the U.S., Cisco may well have plausible arguments that not all of them are recognized under the test set forth in *Sosa*. That is not question for this Court to decide in the case's current posture, but the Court should appreciate that even if Cisco can eliminate some but not all of them, that will still limit the scope of issues for trial and thereby limit Cisco's overall risk of an adverse verdict.

Similarly, this Court declined to grant certiorari on one of Petitioners' proposed questions presented, namely the cert. petition's question 2 regarding the necessary state of mind for aiding-and-abetting liability. The Court may have felt that the Ninth Circuit got that issue right, or that there was no need for this Court to address it now beyond what it has recently said in *Twitter, Inc. v. Taamneh*, 598 U.S. 471 (2023). But if Cisco thinks the actual evidence of its state of mind as developed in discovery falls short, it can and no doubt will return to that issue in a different and

more favorable procedural context than its initial attack on the face of the pleadings.

Finally, any lawyer skimming the pleadings here with a defendant-oriented perspective will notice a potential defense (albeit one likely not well-suited for an initial motion directed to the face of the pleadings) regarding proximate cause. Plaintiffs by and large do not appear to allege that the Chinese authorities employed the technology provided to them by Cisco during the actual alleged torture or other abuse the plaintiffs allegedly suffered while imprisoned. Rather, the theory seems to be that the technology provided by Cisco enabled the Chinese authorities to investigate, surveil, and then detain or arrest the plaintiffs under circumstances where Cisco knew or should have known that plaintiffs would then predictably be tortured or otherwise abused while in custody. Whether actions by Cisco that proximately caused the plaintiffs' arrests also proximately caused the torture that then (allegedly foreseeably) ensued after the arrest seems like a potentially difficult question that this Court is not called upon to decide at this stage, but the Court should be mindful that Cisco will have an opportunity to litigate this point on remand.

CONCLUSION

For the foregoing reasons, the Court should affirm the Ninth Circuit's decision. In the alternative, any reversal should be focused on the case-specific factors Cisco complains of and should not limit the availability of aiding-and-abetting claims under the ATS in other cases where those factors are not present.

Respectfully submitted,

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March 27, 2026

ATTACHMENT A

***AMICI CURIAE* (OCTOBER 7 PLAINTIFFS):**

1. ESTATE OF TAMAR KEDEM SIMAN TOV, BY HEIR-AT-LAW GAD KEDEM,
2. ESTATE OF O. S. T., BY HEIR-AT-LAW GAD KEDEM,
3. GAD KEDEM, INDIVIDUALLY,
4. REUMA KEDEM,
5. TALIA BINER,
6. ESTHER BINER,
7. DITZA HEIMAN,
8. NETA HEIMAN MINA,
9. DAFNA SHAY HEIMAN,
10. GIDEON HEIMAN GLATT,
11. YASMIN BEN GIGI,
12. MAAYAN ELIAZ, INDIVIDUALLY,
13. ESTATE OF DIKLA ARAVA ELIAZ, BY HEIR-AT-LAWS ODIN ELIAZ AND STAV ELIAZ,
14. ESTATE OF T.E., MINOR CHILD. BY HEIR-AT-LAW MAAYAN ELIAZ,
15. ODIN ELIAZ, INDIVIDUALLY,

16. STAV ARAVA ELIAZ, INDIVIDUALLY,
17. DOV ELIAZ,
18. YIFAT TANAMI,
19. SAGI ARAVA,
20. ALON ARAVA,
21. HADAR BEN DAVID,
22. LIAT KOPERSTEIN,
23. YALI KOPERSTEIN,
24. ZIV KOPERSTEIN,
25. NAAMA KOPERSTEIN,
26. GONI KOPERSTEIN AVNI,
27. RAN AHARON AVNI,
28. MAAYAN ZIN, INDIVIDUALLY,
29. D.E., MINOR CHILD, BY LEGAL GUARDIAN MAAYAN ZIN,
30. E.E., MINOR CHILD, BY LEGAL GUARDIAN MAAYAN ZIN,
31. MERAV TAL TAL ALFASI,
32. RACHEL ALFENDRI,
33. TOMER TAL ALFASI,
34. ORI TAL ALFASI,

35. KEREN BLANK,

36. SIGALIT SHARABI,

37. VIKTOR RAHMILOV,

38. GALINA RAHMILOV, INDIVIDUALLY,

39. SOFIA HODEDATOV,

40. SIGAL BENBENISTE,

41. NATALI RAHMILOV,

42. E.L.R, MINOR CHILD, BY LEGAL GUARDIAN GALINA RAHMILOV,

43. TAMIR HODEDATOV,

44. HANANEL BENBENISTE,

45. EFIM SOLOMONOV,

46. ESTATE OF YUVAL BARON, BY HEIRS-AT-LAW ORIT BAR-ON AND ITZHAK BAR-ON,

47. ORIT BAR-ON, INDIVIDUALLY,

48. ITZHAK BAR-ON, INDIVIDUALLY,

49. ESTATE OF MOSHE SHUVA, BY HEIR-AT-LAW YOSSEF SHUVA,

50. YOSSEF SHUVA, INDIVIDUALLY,

51. SONIA SHUVA,

52. MAAYAN DEVIKO,

53. SHIMON SHUVA,

54. ESTATE OF DROR KAPLUN, BY HEIRS-AT-LAW NOAM KAPLUN, MAAYAN KAPLUN KEIDAR, MORAN KAPLUN (TARASOV),

55. NOAM KAPLUN, INDIVIDUALLY,

56. MAAYAN KAPLUN KEIDAR, INDIVIDUALLY,

57. MORAN KAPLUN TARASOV, INDIVIDUALLY,

58. ESTATE OF MARCEL FRAILICH, BY HEIRS-AT-LAW MOR FRIDA STRIKOVKI, ZIV FRAILICH, AMIT FRAILICH,

59. MOR FRIDA STRIKOVSKI, INDIVIDUALLY,

60. ZIV FRAILICH, INDIVIDUALLY,

61. AMIT FRAILICH, INDIVIDUALLY,

62. SHARON CASPI,

63. AMIT CASPI, INDIVIDUALLY,

64. NIV CASPI,

65. MAY CASPI,

66. S. C., MINOR CHILD, BY LEGAL GUARDIAN AMIT CASPI,

67. ESTATE OF VARDA HARAMATY, BY HEIR-AT-LAW AYELET HARAMATI MIZRAHI,

68. AYELET HARAMATI MIZRAHI, INDIVIDUALLY,

69. AVRAHAM MIZRAHI,

70. ITAMAR MIZRAHI,

71. TOMER MIZRAHI,

72. EDITH HYAMS,

73. ASHER SABAG,

74. MICHAL SABAG,

75. DOR MICHAEL SABAG,

76. DANNY OFER VAGE, INDIVIDUALLY,

77. GAT VAGE,

78. H. V., MINOR CHILD, BY LEGAL GUARDIAN DANNY OFER VAGE,

79. S. V., MINOR CHILD, BY LEGAL GUARDIAN DANNY OFER VAGE,

80. ESTATE OF MARK SHINDEL, BY HEIR-AT-LAW JULIA SHINDEL,

81. JULIA SHINDEL, INDIVIDUALLY,

82. IGOR SHINDEL,

83. GUY SHINDEL,

84. B. S., MINOR CHILD, BY LEGAL GUARDIAN JULIA SHINDEL,

85. ESTATE OF YUVAL SALOMON, BY HEIR-AT-LAW DORON SALOMON,

86. DORON SALOMON, INDIVIDUALLY,

87. ESTATE OF GAYA HALIFA, BY HEIR-AT-LAW AVRAHAM HALIFA,

88. AVRAHAM HALIFA, INDIVIDUALLY,

89. SIGAL HALIFA,

90. NOGA HALIFA,

91. IDO HALIFA,

92. IRIT LAHAV,

93. TAMAR LAHAV,

94. ELIYAHU HANAN BUCH,

95. NITZAN LAHAV-PASTER,

96. YAARA SZATMARI,

97. ILAN LAHAV,

98. GALIT LAHAV, INDIVIDUALLY,

99. GUI LAHAV,

100. R. L., MINOR CHILD, BY LEGAL GUARDIAN GALIT LAHAV,

101. OMER LAHAV