

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOHN GREGORY LAMBROS,
Plaintiff,

DEMAND FOR TRIAL BY
JURY

CIVIL ACTION NO. 19-cv-1929

Removed from: Superior Court
Of the District of Columbia,
Case No. 2017-CA-000929-B
Judge: Florence Y. Pan

Vs.

FEDERATIVE REPUBLIC OF BRAZIL, et al.,
Defendants.

AFFIDAVIT FORM

MOTION REQUESTING COURT TO ORDER DEFENDANTS TO POST A SURETY BOND IN THE AMOUNT OF "THREE HUNDRED SIXTY-TWO BILLION, FORTY MILLION DOLLARS" (\$362,040,000,000.00) DURING THE PENDENCY OF THE REMOVAL OF CLAIMS FROM THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA TO THIS FEDERAL COURT. PLAINTIFF LAMBROS IS BEING PREJUDICED AS THE NONMOVING PARTY IN THIS REMOVAL PROCESS, AS TO HIS LOSSES SUSTAINED AS A RESULT OF BEING FORCED TO FORGO EXECUTION OF DAMAGE AWARDS ON JUDGMENT ON JULY 5, 2019, WITHIN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA.

1. COMES NOW, Plaintiff - Movant JOHN GREGORY LAMBROS, (Hereinafter "MOVANT"), Pro Se, and requests this Court to construe this filing liberally. See, HAINES vs. KERNER, 404 U.S. 519, 520-21 (1972). Also, granting Plaintiff Lambros' "MOTION

REQUESTING COURT TO ORDER DEFENDANTS TO POST A SURETY BOND IN THE AMOUNT OF 'THREE HUNDRED SIXTY-TWO BILLION, FORTY MILLION DOLLARS' (\$362,040,000,000.00) DURING THE PENDENCY OF THE REMOVAL OF CLAIMS FROM THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA TO THIS FEDERAL COURT. PLAINTIFF LAMBROS IS BEING PREJUDICED AS THE NONMOVING PARTY IN THIS REMOVAL PROCESS, AS TO HIS LOSSES SUSTAINED AS A RESULT OF BEING FORCED TO FORGO EXECUTION OF DAMAGE AWARDS ON JUDGMENT ON JULY 5, 2019, WITHIN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA."

2. In support of this request plaintiff relies upon the record in this case and the following facts that are submitted in affidavit form herein. Therefore, Plaintiff restates and incorporates all pleadings, motions, exhibits, testimony and documents filed within this action. See, F.R.C.P. 10(c).

3. In support of this request, I state the following as true and correct pursuant to Title 28 USC 1746.

PRELIMINARY STATEMENT - HISTORY OF CASE - BACKGROUND

4. Movant Lambros filed the complaint in this above-entitled matter on February 10, 2017.

5. October, 6, 2017: United Parcel Service International confirmed service of the complaint and all required documentation and forms to the Ministry of Justice in Brasilia, Brazil on October 6, 2017.

6. April 8, 2019: The Honorable Judge Florence Y. Pan, Superior Court of the District of Columbia, Civil Division, issued an "ORDER" within this above-entitled action stating that:

- A. Plaintiff's Motion Requesting Entry of Default is GRANTED.
- B. **The default is entered against both defendants.**
- C. The status hearing scheduled for April 26, 2019, is vacated.
- D. That the parties appear for a status hearing on Friday, July 5, 2019, at 10:30 a.m. in Courtroom 415. **This hearing may be converted to an**

ex parte proof hearing upon the filing of a motion for default judgment by Plaintiff. See, EXHIBIT B.

7. April 8, 2019: **"ENTRY OF DEFAULT" ---- Plaintiff Lambros has no further obligation to prove Liability. See, LOCKHART vs. CADE, 728 A.2d 65 (District of Columbia Court of Appeals, March 4, 1999)("entry of default 'operates as an admission by the defaulting party that there are no issues of liability, but leaves the issue of damages unresolved until entry of judgment")**

8. May 15, 2019: The Honorable Judge Florence Y. Pan, Superior Court of the District of Columbia, Civil Division, issued an "ORDER" within this above-entitled action stating that:

- A. "The court issued an order on April 8, 2019, ruling that defendants were properly served with process."
- B. "Defendants have not filed responsive pleadings to the complaint."
- C. "On April 8, 2019, the court entered defaults against defendants."
- D. **"ORDERED** that the status hearing scheduled for July 5, 2019, is **CONVERTED TO AN EX PARTE PROOF HEARING;** See, **EXHIBIT C.**

9. June 27, 2019: Both Defendants' in this action hired the law firm FOLEY HOAG LLP to represent them in this above entitled action. Attorney Clara B. Brillembourg, FOLEY HOAG LLP filed the Civil Cover Sheet in this action on June 27, 2019, Document 1-1, two pages in length, which offered the following information:

- A. Case No. 1:19-cv-01929.
- B. Plaintiff: John Gregory Lambros

C. Defendants: Federative Republic of Brazil; and State of Rio de Janeiro.

D. REQUESTED IN COMPLAINT: **DEMAND**

\$301,700,000,000.00 (Three Hundred One Billion, Seven-Hundred Million Dollars.) See, EXHIBIT A.

10.

SURETY BOND

PURPOSE AND EFFECT OF POSTING A SURETY BOND IS TO PRESERVE THE STATUS QUO OF PLAINTIFF LAMBROS DURING THE PENDENCY OF THE REMOVAL OF CLAIMS FROM THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA TO THIS FEDERAL COURT. PLAINTIFF LAMBROS IS BEING PREJUDICED AS THE NONMOVING PARTY IN THIS REMOVAL PROCESS, AS TO HIS LOSSES SUSTAINED AS A RESULT OF BEING FORCED TO FORGO EXECUTION OF DAMAGE AWARDS ON JUDGMENT ON JULY 5, 2019, WITHIN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA.

11. As this Court understands, all civil monetary judgments are generally enforceable during the pendency of an appeal unless and until they are stayed or superseded by posting a sufficient bond or other security. Thus, an appeal does not automatically stay enforcement of a final judgment. In the absence of a sufficient bond

or alternate security approved by this court, a judgment by Judge Pan on July 5, 2019, would of allowed Plaintiff Lambros to begin executing on a monetary judgment against both Defendants who are **"SEVERALLY AND JOINTLY LIABLE."**

12. Plaintiff Lambros extends the privilege to both Defendants to post a bond in this action in the amount of **"THREE HUNDRED SIXTY-TWO BILLION, FORTY MILLION DOLLARS' (\$362,040,000,000.00)"**, as a price of interdicting the validity of Judge Pan's award of damages on July 5, 2019. See, HERBERT vs. EXXON CORP., 953 f.2d 936, 938 (5th Cir. 1992)("The posting of a bond protects the [judgment creditor] from the risk of a later uncollectable judgment and compensates him for delay in the entry of final judgment [upon which he may execute]." (internal quotations and citations omitted).

13. Of interest, in Beatrice Foods vs. New England Printing, 930 F.2d 1572 (Fed. Cir. 1991), on appeal, the Circuit Court held that Beatrice Foods **"had proven that damages were due"** and the only issue on remand was the proper amount due. Id. at 1576. Plaintiff Lambros has proven damages were due on July 5, 2019, the day Judge Pan was ruling on damages for Plaintiff. See, Paragraph 7 above.

CALCULATING THE PENAL SUM OF THE SURETY BOND

14. Both defendants clearly admitted on June 27, 2019, through the Attorney Clara B. Brillembourg, FOLEY HOAG LLP who filed the Civil Cover Sheet in this action - Document 1-1, two pages in length, which offered the following information:

- A. Case No. 1:19-cv-01929.
- B. Plaintiff: John Gregory Lambros
- C. Defendants: Federative Republic of Brazil; and State of Rio de Janeiro.

D. REQUESTED IN COMPLAINT: **DEMAND**

\$301,700,000,000.00 (Three Hundred One Billion, Seven-Hundred Million Dollars.) See, EXHIBIT A.

15. Generally, federal courts require the PENAL SUM of the surety bond to total the entire amount of the monetary judgment, including any pre-judgment interest, attorneys' fees, costs and one to two years of post-judgment interest. Most federal courts require 120 percent of the judgment. For example, Maryland Federal District Court Local Rule 110(a)(1) requires 120 percent of the judgment.

16. Plaintiff simply added twenty (20) percent to the amount of the demand requested within the Civil Cover sheet filed by defendants on June 27, 2019:

\$301,700,000,000.00

+ 60,340,000,000.00 (Additional 20 percent)

\$362,040,000,000.00 (Three Hundred Sixty-Two Billion, Forty Million Dollars)

17. Due to the wealth of the Defendants, a functional alternative to posting a bond, is to post the full amount of the bond into the registry of the court. This saves the ten (10) to twenty (20) percent insurers charge for the bond.

CONCLUSION AND RELIEF REQUESTED:

18. Plaintiff Lambros requests this Court to grant his "MOTION REQUESTING COURT TO ORDER DEFENDANTS TO POST A SURETY BOND IN THE AMOUNT OF "THREE HUNDRED SIXTY-TWO BILLION, FORTY MILLION DOLLARS" (\$362,040,000,000.00) DURING THE PENDENCY OF THE REMOVAL OF CLAIMS FROM THE SUPERIOR

COURT OF THE DISTRICT OF COLUMBIA TO THIS FEDERAL COURT. PLAINTIFF LAMBROS IS BEING PREJUDICED AS THE NONMOVING PARTY IN THIS REMOVAL PROCESS, AS TO HIS LOSSES SUSTAINED AS A RESULT OF BEING FORCED TO FORGO EXECUTION OF DAMAGE AWARDS ON JUDGMENT ON JULY 5, 2019, WITHIN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA."

19. I JOHN GREGORY LAMBROS states the above information is true and correct under the penalty of perjury, as per Title 28 USC 1746.

EXECUTED ON: August 12, 2019

A handwritten signature in black ink, appearing to read 'John Gregory Lambros', written over a horizontal line.

John Gregory Lambros, Pro Se

www.Lambros.Name

CIVIL COVER SHEET

JS-44 (Rev. 6/17 DC)

I. (a) PLAINTIFFS: John Gregory Lambros
DEFENDANTS: Federative Republic of Brazil, State of Rio de Janeiro
(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES)
COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT (IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)
pro se
U.S. Penitentiary Leavenworth
P.O. Box 1000
Leavenworth, KS 66048-1000
ATTORNEYS (IF KNOWN)
Clara E. Brillembourg
Foley Hoag LLP
1717 K St NW, Washington, DC 20006
202-261-7334

II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY
PTF DFT PTF DFT
Citizen of this State 1 1
Citizen of Another State 2 2
Citizen or Subject of a Foreign Country 3 3
Incorporated or Principal Place of Business in This State 4 4
Incorporated and Principal Place of Business in Another State 5 5
Foreign Nation 6 6

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

A. Antitrust: 410 Antitrust
B. Personal Injury/Malpractice: 310 Airplane, 315 Airplane Product Liability, 320 Assault, Libel & Slander, 330 Federal Employers Liability, 340 Marine, 345 Marine Product Liability, 350 Motor Vehicle, 355 Motor Vehicle Product Liability, 360 Other Personal Injury, 362 Medical Malpractice, 365 Product Liability, 367 Health Care/Pharmaceutical Personal Injury Product Liability, 368 Asbestos Product Liability
C. Administrative Agency Review: 151 Medicare Act, Social Security: 861 HIA (1395ff), 862 Black Lung (923), 863 DIWC/DIWW (405(g)), 864 SSID Title XVI, 865 RSI (405(g)), Other Statutes: 891 Agricultural Acts, 893 Environmental Matters, 890 Other Statutory Actions (If Administrative Agency is Involved)
D. Temporary Restraining Order/Preliminary Injunction: Any nature of suit from any category may be selected for this category of case assignment.
(If Antitrust, then A governs)

E. General Civil (Other) OR F. Pro Se General Civil
Real Property: 210 Land Condemnation, 220 Foreclosure, 230 Rent, Lease & Ejectment, 240 Torts to Land, 245 Tort Product Liability, 290 All Other Real Property
Personal Property: 370 Other Fraud, 371 Truth in Lending, 380 Other Personal Property Damage, 385 Property Damage Product Liability
Bankruptcy: 422 Appeal 27 USC 158, 423 Withdrawal 28 USC 157, Prisoner Petitions: 535 Death Penalty, 540 Mandamus & Other, 550 Civil Rights, 555 Prison Conditions, 560 Civil Detainee - Conditions of Confinement
Property Rights: 820 Copyrights, 830 Patent, 835 Patent - Abbreviated New Drug Application, 840 Trademark
Federal Tax Suits: 870 Taxes (US plaintiff or defendant), 871 IRS-Third Party 26 USC 7609, Forfeiture/Penalty: 625 Drug Related Seizure of Property 21 USC 881, 690 Other
Other Statutes: 375 False Claims Act, 376 Qui Tam (31 USC 3729(a)), 400 State Reapportionment, 430 Banks & Banking, 450 Commerce/TCC Rates/etc., 460 Deportation
462 Naturalization Application, 465 Other Immigration Actions, 470 Racketeer Influenced & Corrupt Organization (checked), 480 Consumer Credit, 490 Cable/Satellite TV, 850 Securities/Commodities/Exchange, 896 Arbitration, 899 Administrative Procedure Act/Review or Appeal of Agency Decision, 950 Constitutionality of State Statutes, 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

EXHIBIT A.

<input type="checkbox"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="checkbox"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="checkbox"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="checkbox"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="checkbox"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multi-district Litigation
 7 Appeal to District Judge from Mag. Judge
 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 Plaintiff brings twelve causes of action, including claims under 18 USC § 1962(d) (Racketeer Influenced & Corrupt Organizat

VII. REQUESTED IN COMPLAINT CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ 301,700,000,000 Check YES only if demanded in complaint
 JURY DEMAND: YES NO

VIII. RELATED CASE(S) IF ANY (See instruction) YES NO If yes, please complete related case form

DATE: June 27, 2019 SIGNATURE OF ATTORNEY OF RECORD: /s/ Clara E. Brillembourg

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

EXHIBIT A.

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

JOHN GREGORY LAMBROS : Case Number: 2017 CA 929 B
v. : Judge: Florence Y. Pan
FEDERATIVE REPUBLIC OF BRAZIL, *et al.* : Next Hearing: July 5, 2019

ORDER

This matter comes before the Court upon the Motion Requesting Entry of Default, filed by plaintiff on March 18, 2019. Plaintiff filed his complaint on February 10, 2017. Plaintiff availed himself of the services of Crowe Foreign Services to effectuate service on defendants. Based on the documentation received by the Court from Crowe Foreign Services on November 14, 2018, January 18, 2019, and February 8, 2019, along with the representations made in court on February 8, 2019, by Crowe Foreign Services' director of operations, Celeste Ingalls, the Court finds that defendants were properly served. On March 18, 2019, plaintiff filed an amended certificate of service that states that he has served the instant motion on defendants by mailing it to the Ministry of Justice in Brasilia. Defendants have not filed a responsive pleading to the complaint nor have they filed an opposition to the instant motion. The Court therefore enters a default against defendants. *See* D.C. Super. Ct. Civ. R. 55(a) ("When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, the clerk or the court must enter the party's default."). Accordingly, this 8th day of April, 2019, it is hereby

ORDERED that the Motion Requesting Entry of Default is **GRANTED**; and it is further

ORDERED that default is entered against both defendants; and it is further

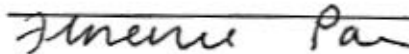
ORDERED that the status hearing scheduled for April 26, 2019, is vacated; and it is

further

EXHIBIT B.

ORDERED that the parties appear for a status hearing on Friday, July 5, 2019, at 10:30 a.m. in Courtroom 415. This hearing may be converted to an *ex parte* proof hearing upon the filing of a motion for default judgment by plaintiff.

SO ORDERED.



Judge Florence Y. Pan
Superior Court of the District of Columbia

Copies to:

John Gregory Lambros
1759 Van Buren Avenue
Saint Paul, MN 55104

Federative Republic of Brazil
c/o Ministerio da Justica
SCN-Quadra 6-Ed. Venancia 3.000
Bloco A-2° Andar
70716-900 Brasilia-DF
Brazil

State of Rio Janeiro
Federative Republic of Brazil
c/o Ministerio da Justica
SCN-Quadra 6-Ed. Venancia 3.000
Bloco A-2° Andar
70716-900 Brasilia-DF
Brazil

EXHIBIT B.

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

JOHN GREGORY LAMBROS : Case Number: 2017 CA 929 B
v. : Judge: Florence Y. Pan
FEDERATIVE REPUBLIC OF BRAZIL, *et al.* : *Ex Parte* Proof Hearing: July 5, 2019

ORDER

This matter comes before the Court upon consideration of plaintiff's Motion for Entry of Default Judgment, filed on May 13, 2019. Plaintiff filed his complaint against defendants on February 10, 2017. The Court issued an order on April 8, 2019, ruling that defendants were properly served with process. Defendants have not filed responsive pleadings to the complaint. On April 8, 2019, the Court entered defaults against defendants.

As to plaintiff's request that an attorney be appointed, there is no right to appointment of counsel in civil cases. *See e.g., Cloutterbuck v. Cloutterbuck*, 556 A.2d 1082, 1084 (D.C. 1989) (explaining that the 6th Amendment right to counsel, bolstered by the Criminal Justice Act, is "confined to criminal proceedings"); *Williams v. Court Services & Offender Supervision Agency for D.C.*, 878 F.Supp.2d 263, 266 (D.D.C. 2012) (quoting *Brown v. Children's Nat'l Med. Ctr.*, 773 F.Supp.2d 125, 140 (D.D.C. 2011) ("no indigent civil litigant is guaranteed counsel").

Moreover, the Court does not have the resources to appoint attorneys to represent civil litigants.

Accordingly, this 15th day of May, 2019, it is hereby

ORDERED that the status hearing scheduled for July 5, 2019, is converted to an *ex parte* proof hearing; and it is further

EXHIBIT C.

ORDERED that plaintiff's request for appointment of counsel is denied.

SO ORDERED.

Florence Pan

Judge Florence Y. Pan
Superior Court of the District of Columbia

Copies to:

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EXHIBIT C.