

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

**JANE DOE I, JANE DOE II AND
JANE DOE III,**

Plaintiffs,

v.

**EMMANUEL CONSTANT,
a.k.a. TOTO CONSTANT,**

Defendant.

)
) **Case No.: 04-CV-10108 (SHS)**
)
)

) **AFFIDAVIT IN SUPPORT OF MOTION
FOR JUDGMENT BY DEFAULT**
)
)

STATE OF CALIFORNIA)
) ss.:
COUNTY OF SAN FRANCISCO)

MOIRA FEENEY, being duly sworn, deposes and says:

1. I am a member of the bar of the state of California. I have been admitted *pro hac vice* to this Court and am an attorney with the Center for Justice and Accountability, counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the facts set forth below and, if called as a witness, could and would competently testify thereto.

2. I make this affidavit pursuant to Local Rule 55.1 and 55.2(b) of the Local Civil Rules for the Southern District of New York, in support of Plaintiffs' Motion for Judgment by Default against Defendant Emmanuel Constant.

3. This is an action by Plaintiffs for damages caused by Defendant Emmanuel Constant.

4. Jurisdiction of the subject matter of this action is based on the Alien Tort Statute, 28 U.S.C. § 1350; the Torture Victim Protection Act, 28 U.S.C. § 1350 note; and 28

