

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

HATICE CENGIZ, *et al.*,

Plaintiffs,

v.

Case No. 20-CV-03009-JDB

MOHAMMED BIN SALMAN BIN
ABDULAZIZ AL SAUD, *et al.*,

Defendants.

NOTICE OF SUPPLEMENTAL AUTHORITY

Defendants His Royal Highness Mohammed bin Salman bin Abdulaziz Al Saud (the “Crown Prince”), Saad Al-Qahtani, and Ahmed Al-Assiri submit this notice of supplemental authority to inform the Court of the September 8, 2022 decision of the Republic of Turkey, Istanbul Regional Court of Justice, 1st Criminal Court. A copy of this decision and a certified translation are attached as Exhibit A. The September 8, 2022 decision affirms a June 17, 2022 decision of the Istanbul 11th High Criminal Court dismissing “all public legal charges filed” against all defendants arising from the murder of Jamal Khashoggi and denies “with prejudice” an appeal of the June 17, 2022 decision. Ex. A at 3. As a result, the Turkish criminal proceeding arising from Mr. Khashoggi’s death is closed with finality.

Plaintiff Hatice Cengiz’s claim under the Torture Victims Protection Act of 1991 must be dismissed because, among other things, she has failed to exhaust her remedies in Turkey. *See* ECF No. 21, at 44-46; ECF No. 33, at 22-25. Cengiz has asserted that any civil proceeding brought against the Crown Prince would likely be stayed pending the resolution of the then-pending Turkish criminal case and, thus, that the Turkish court could not provide an adequate

remedy. *See* ECF No. 27, at 52-53. The dismissal of the Turkish criminal case with prejudice forecloses this argument.

Dated: October 3, 2022

Respectfully submitted,

/s/ Michael K. Kellogg

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Ahmed Al-Assiri*

CERTIFICATE OF SERVICE

I certify that on October 3, 2022, I electronically filed the foregoing NOTICE OF SUPPLEMENTAL AUTHORITY, using the ECF system, which sent notice of filing in this matter to all counsel of record.

/s/ Michael K. Kellogg
Michael K. Kellogg
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