

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

MOHAMED ABDEL RAOUF BAHGAT,

Petitioner,

v.

ARAB REPUBLIC OF EGYPT,

Respondent.

Civ. No. 1:20-cv-2169-TNM

PETITIONER’S MOTION FOR DEFAULT JUDGMENT

Petitioner Mohamed Abdel Raouf Bahgat (“Bahgat”), by and through its undersigned counsel, respectfully requests that the Court enter a default judgment against the Arab Republic of Egypt (“Egypt”) pursuant to 28 U.S.C. §1608(e) and Federal Rule of Civil Procedure 55(b)(2). For the reasons set forth in the accompanying Memorandum of Points and Authorities in Support of Petitioner’s Motion for Default Judgment, and related papers, and consistent with the Proposed Judgment filed with this motion, Bahgat hereby moves this Court to:

1. Enter a default judgment against Egypt in favor of Bahgat in the following amounts:
 - a. USD \$43,770,000 plus interest at the rate of USD 12-month LIBOR + 2% compounded annually from February 19, 2000, until the date of satisfaction,
 - b. EUR 650,584.85, GBP 6,160,320.48, and USD \$900,000 plus interest on each sum running at the rate of USD 12-month LIBOR + 4% compounded annually from December 23, 2019, until the date of satisfaction; and
2. Grant Bahgat its costs of this proceeding, including reasonable attorneys’ fee; and
3. Grant such other and further relief as this Court deems just and proper.

Dated: July 16, 2021

Respectfully submitted,

/s/ Dan Tan

Dan Tan
(Bar ID: 999803)
DAN TAN LAW
305 Broadway
Suite 750
New York, NY 10007
Email: dan@dantanlaw.com
Phone: 646-580-0080

Mark Beckett*
(*Admission pending)
BECKETT LAW LLC
45 Rockefeller Plaza
New York, NY 10111
Telephone: 212-332-3239
mark@beckettlaw.co

*Attorneys for Petitioner Mohamed
Abdel Raouf Bahgat*