

DAVIS WRIGHT TREMAINE LLP

1 implied that all men who look like him are like him, sworn enemies. CAIR-LA called on Los
2 Angeles-based KCOP Television, Inc., Channel 13, to remove the billboards.

3 88. CAIR-SFBA denies the allegations in paragraph 88 of the Complaint. No CAIR
4 chapter ever denied bin Laden’s responsibility of the embassy bombings. They deny that Mr.
5 Hooper made the statements quoted. When he stated that there was a “misunderstandings of both
6 sides” he was speaking about a matter completely unrelated to the Al Qaeda embassy bombings or
7 Osama bin Laden, but instead was speaking about the relationship between the West and the
8 Muslim world.

9 89. CAIR-SFBA denies the allegations in paragraph 89 of the Complaint. See
10 paragraph 69 of the Answer, above.

11 90. CAIR-SFBA lacks knowledge or information sufficient to form a belief as to the
12 truth of the allegations contained in paragraph 90 of the Complaint, and on that basis denies such
13 allegations.

14 91. CAIR-SFBA denies the allegations in paragraph 91 of the Complaint. CAIR-SFBA
15 denies that CAIR exploited 9/11. CAIR-National had a picture of the World Trade Center on its
16 website and asked readers to donate to help the survivors of the disaster. They offered a link to
17 websites for Muslim and non-Muslim organizations collecting donations for 9/11 survivors,
18 including the Holy Land Foundation’s website. CAIR-SFBA denies that this was exploiting 9/11
19 as virtually all Americans joined in the spirit of patriotism and public service after the tragedy.

20 92. CAIR-SFBA lacks knowledge or information sufficient to form a belief as to the
21 truth of the allegations contained in paragraph 92 of the Complaint, and on that basis denies such
22 allegations.

23 93. CAIR-SFBA denies the allegations in paragraph 93 of the Complaint.

24 94. CAIR-SFBA admits the allegations in paragraph 94 of the Complaint, as the
25 unilateral and unconstitutional deprivation of property without due process was performed by the
26 United States government without providing the Holy Land Foundation any opportunity to
27 examine the evidence used to reach this determination or to challenge the determination before
28 any court of law.