

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

RAYMING CHANG, *et al.* :

Plaintiffs :

v : Case Number 02-2010 (EGS)

UNITED STATES OF AMERICA, *et al.* :

Defendant/  
Cross Claimant :

v :

UNITED STATES PARK POLICE :

Cross Defendant. :

**CROSS CLAIM**

COMES NOW the Defendant/Cross Claimant, Fairfax County Sheriff's Department (hereinafter referred to as "FCSD"), by and through its counsel, Alexander Francuzenko, Esquire and the law firm of O'Connell, O'Connell & Sarsfield, and asserts this Cross Claim against the United States Park Police ("USPP"), and for its cause of action states as follows:

1. The Chang plaintiffs allege in their Third Amended Complaint that they sustained various injuries and damages as a result of actions that occurred at the IMF demonstrations. The FCSD deny all allegations asserted against it in the Third Amended Complaint.

2. USPP agreed, pursuant to contract, to indemnify and save harmless FCSD against all claims by third parties for property damage and personal injury which may arise out of activities of the other parties to this agreement, outside their respective jurisdictions.

(See Exhibit 1, Interagency Agreement).

3. Chang plaintiffs' alleged injuries and damages, if any, arose out of the IMF demonstrations that occurred September 26 - 28, 2002 in Washington, D.C.

4. The Fairfax County Sheriff's Department is entitled to indemnification from USPP with regard to the claims asserted by the Chang plaintiffs.

WHEREFORE, the Defendant/Cross Claimant, Fairfax County Sheriff's Department, demands judgment from and against Defendant/Cross Defendant, United States Park Police, in the form of contractual indemnity as to the claims asserted by the Chang plaintiffs.

Respectfully submitted,

O'CONNELL, O'CONNELL & SARFIELD

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Cross Claim was mailed, first-class, postage prepaid, this 7<sup>th</sup> day of October, 2005 to:

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