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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**

14 AHIMSA WICKREMATUNGE, in her
15 individual capacity and in her capacity as
16 the legal representative of the ESTATE OF
17 LASANTHA WICKREMATUNGE

18 *Plaintiff,*

19 v.

20 NANDASENA GOTABAYA RAJAPAKSA,

21 *Defendant.*

Case No. 2:19-cv-02577-R-RAO

**DECLARATION OF
MALINDA SENEVIRATNE IN
SUPPORT OF DEFENDANT'S
MOTION TO STAY**

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Attorneys for Defendant
Nandasena Gotabaya Rajapaksa

I, Malinda Seneviratne, hereby declares as follows:

1. My name is Malinda Seneviratne. I have personal knowledge of and am competent to testify to the matters stated herein by virtue of my status as a journalist and political commentator in Sri Lanka.
2. I received an education at University of Peradeniya in Sri Lanka, Harvard University, University of Southern California, and Cornell University. I currently live and work in Kottawa, Sri Lanka.
3. The political system in Sri Lanka has three major political parties: the United National Party (UNP), the Sri Lanka Podujana Peramuna (SLPP), and the Sri Lanka Freedom Party (SLFP).
4. The current President of Sri Lanka, Maithripala Sirisena, is a member of the SLFP. President Sirisena has not decided whether he will run for re-election in December 2019.
5. The current Prime Minister of Sri Lanka, Ranil Wickremesinghe, is a member of the UNP.
6. On August 11, 2019, the SLPP nominated Gotabaya Rajapaksa as the party's candidate for Sri Lanka's December 2019 presidential election.
7. The UNP and the SLFP have not decided on a candidate to nominate.
8. The UNP has been unable to decide whether to nominate Prime Minister Wickremesinghe or Sajith Premadasa, the deputy party leader. The UNP's indecision has revealed deep intra-party divisions indicating that the "Wickremesinghe" and "Premadasa" camps are preparing for a protracted battle for the nomination, with no end in sight.
9. In light of the SLFP and the UNP being unable to nominate a candidate, Mr. Rajapaksa is the probable victor in the December 2019 presidential election.
10. Recent voting patterns strongly suggest that Mr. Rajapaksa is the leading candidate to win the presidential election. The coalition that supported the SLFP

and President Sirisena's 2015 election no longer exists. His party, the SLFP, failed to receive 15% of the votes in the February 2018 local government elections.

11. In 2015, in Sri Lanka's Western Province, the SLPP candidate for president—Mr. Rajapaksa's brother—received several hundred thousand votes less than what it had received in the 2010 election. However, the SLPP recovered a majority of these votes in the February 2018 election, thereby signifying that Mr. Rajapaksa should receive these votes in December 2019.

12. To the extent small political parties might nominate a candidate for president, there is no indication that these small parties, separately or together, could obtain such a significant number of votes that it would influence the election's outcome.

13. Under these circumstances, based on my knowledge and experience as a professional journalist and political commentator in Sri Lanka, Mr. Rajapaksa is currently the candidate most likely to win the presidency in the December 2019 election.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: _____, 2019.

Malinda Seneviratne