

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Ghayoori v. Sultanate of Oman

Ghayoori · No. Civil Action No. 24-cv-3639 (JMC) · Decided January 7, 2026

SUMMARY

The United States District Court for the District of Columbia denied Ramin Ghayoori's motion for default judgment against the Sultanate of Oman and dismissed the action for lack of subject-matter jurisdiction. The court held that Oman was not designated as a state sponsor of terrorism when the alleged detention occurred and that the Foreign Sovereign Immunities Act's tort exception did not apply because the alleged injury occurred in Oman.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Jia M. Cobb
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 7, 2026
DOCKET	Civil Action No. 24-cv-3639 (JMC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff moved for entry of default judgment and sought \$65 million in damages after the Clerk entered default when the Sultanate of Oman failed to respond or appear. The court denied the motion for lack of subject matter jurisdiction and dismissed the action.
STANDARD OF REVIEW	The court independently determined whether subject matter jurisdiction existed; under Federal Rule of Civil Procedure 12(h)(3), the court was required to dismiss upon determining that it lacked subject matter jurisdiction.
PRECEDENTIAL VALUE	published

TOPICS

- foreign sovereign immunity
- subject matter jurisdiction
- default judgment
- civil procedure
- torts

PRACTICE AREAS

- foreign sovereign immunity
- civil procedure
- international law
- torts

QUESTIONS PRESENTED

1. Whether the Foreign Sovereign Immunities Act's terrorism exception under 28 U.S.C. § 1605A supplied subject matter jurisdiction over Ghayoori's claims against Oman.
2. Whether the FSIA exception for personal injury occurring in the United States under 28 U.S.C. § 1605(a)(5) supplied subject matter jurisdiction.
3. Whether default judgment could be entered when the court lacked subject matter jurisdiction.

HOLDINGS

1. The terrorism exception in 28 U.S.C. § 1605A did not apply because Oman was not designated as a state sponsor of terrorism at the time of the alleged unlawful act.
2. The personal-injury tort exception in 28 U.S.C. § 1605(a)(5) did not apply because the alleged tort and injury occurred in Oman rather than in the United States.
3. Default judgment could not be entered because the court lacked subject matter jurisdiction over the claims.

KEY QUOTATIONS

“The Foreign Sovereign Immunities Act “affords the sole basis for obtaining jurisdiction over a foreign state in United States courts.”” (at 1)

“Because the Court has “determine[d] . . . that it lacks subject-matter jurisdiction,” Fed. R. Civ. P. 12(h)(3), the action is DISMISSED.” (at 2)

FACTUAL BACKGROUND

Ghayoori alleged that Oman detained him for a little less than two weeks in an Omani detention facility. He asserted that the detention violated the Foreign Sovereign Immunities Act, international law, the Convention Against Torture, and the Vienna Convention. The alleged detention, tort, and injury occurred in Oman, and Oman was not designated as a state sponsor of terrorism in 2024 or at the time of the alleged detention.

PROCEDURAL HISTORY

Ghayoori filed suit against the Sultanate of Oman alleging violations of the Foreign Sovereign Immunities Act, international law, the Convention Against Torture, and the Vienna Convention arising from his detention in Oman. Oman did not respond or appear, and the Clerk entered default. The court considered Ghayoori's motion for default judgment and dismissed the case because neither asserted FSIA exception established subject matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Mohammadi v. Islamic Republic of Iran, 782 F.3d 9, 13–14 (D.C. Cir. 2015)
- Persinger v. Islamic Republic of Iran, 729 F.2d 835, 838, 842 (D.C. Cir. 1984)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA RAMIN GHAYOORI, Plaintiff, Case No. 24-cv-3639 (JMC) v. SULTANATE OF OMAN, Defendant. MEMORANDUM OPINION Ramin Ghayoori sued the Sultanate of Oman, alleging the country violated the Foreign Sovereign Immunities Act, international law, the Convention Against Torture, and the Vienna Convention when it detained him for a little less than two weeks in an Omani detention facility.

See ECF 1 ¶¶ 10–31. Because Oman failed to respond or appear, the Clerk entered a default. See ECF 6. Now, Ghayoori has moved for entry of default judgment and asked the Court to award him \$65 million in damages. See ECF 7 at 3–4.

Because the Court does not have subject matter jurisdiction over Ghayoori’s claims, the motion is DENIED and the case is DISMISSED.¹ The Foreign Sovereign Immunities Act “affords the sole basis for obtaining jurisdiction over a foreign state in United States courts.” Mohammadi v. Islamic Republic of Iran, 782 F.3d 9, 13 (D.C. Cir. 2015).

The Act “establishes a general rule granting foreign sovereigns immunity from the jurisdiction of United States courts,” but it also provides “a number of exceptions.” Id. at 13–14. Ghayoori invokes two of those exceptions to establish jurisdiction here.

First, he claims ¹ Unless otherwise indicated, the formatting of citations has been modified throughout this opinion, for example, by omitting internal quotation marks, emphases, citations, and alterations and by altering capitalization. All pincites to documents filed on the docket in this case are to the automatically generated ECF Page ID number that appears at the top of each page.

¹ that the Court has jurisdiction under the terrorism exception found in 28 U.S.C. § 1605A. See ECF 1 ¶ 2. That exception only applies, however, if the foreign country being sued “was designated as a state sponsor of terrorism at the time” of the alleged unlawful act. § 1605A(a)(2)(A)(i)(I); see Mohammadi, 782 F.3d at 14 (describing this as one of the terrorism exception’s “require[ments]”).

Oman was not designated as a state sponsor of terrorism in 2024 at the time Ghayoori was detained, nor is it so designated today. See U.S. Dep’t of State, State Sponsors of Terrorism, <https://perma.cc/32FF-5TDR>. Alternatively, Ghayoori invokes the exception that applies to a suit seeking damages “for personal injury... occurring in the United States” that was “caused by the tortious act” of a foreign state.

28 U.S.C. § 1605(a)(5); see ECF 1 ¶ 3 (citing this provision). But as the plain text of that provision indicates, this exception only applies where the “personal injury... occur[s] in the United States.” § 1605(a)(5); see *Persinger v. Islamic Republic of Iran*, 729 F.2d 835, 838 (D.C. Cir. 1984) (“[I]f a foreign state’s acts or omissions cause tortious injury within the United States,... the foreign state’s immunity is abrogated.”).

Here, “both the [alleged] tort and the injury” occurred in Oman. *Persinger*, 729 F.2d at 842. This provision is therefore inapplicable. Because Ghayoori has not demonstrated that the Court has jurisdiction over his claims, the motion for default judgment is DENIED. And because the Court has “determine[d]... that it lacks subject-matter jurisdiction,” Fed. R. Civ.

P. 12(h)(3), the action is DISMISSED. SO ORDERED. _____ JIA M. COBB United States District Judge Date: January 7, 2026 2