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18 UNITED STATES DISTRICT COURT  
19 FOR THE EASTERN DISTRICT OF WASHINGTON

20 SULEIMAN ABDULLAH SALIM,  
21 MOHAMED AHMED BEN SOUD, OBAID  
22 ULLAH (AS PERSONAL  
23 REPRESENTATIVE OF GUL RAHMAN),

No. 2:15-cv-286-JLQ

24 Plaintiffs,

**PLAINTIFFS’  
WITNESS LIST**

25 v.

26 JAMES ELMER MITCHELL and JOHN  
“BRUCE” JESSEN

Defendants.

1 Plaintiffs Suleiman Abdullah Salim, Mohamed Ahmed Ben Soud, and ObaidUllah (as  
 2 personal representative of Gul Rahman) (collectively, "Plaintiffs"), by and through their  
 3 undersigned counsel, hereby serve this witness list pursuant to the Court's July 8, 2016  
 4 Scheduling Order [Dkt. 59]. As Plaintiffs will have the burden of proof on most issues at  
 5 trial, they respectfully reserve the right to supplement or otherwise amend this list upon  
 6 appropriate application to the Court under the terms of the Scheduling Order, if required.  
 7 Plaintiffs further reserve the right to call, live or by deposition, any witnesses identified in  
 8 Defendants' witness list. Plaintiffs also reserve the right to call, live or by deposition, and  
 9 again upon appropriate application to the Court, if required, witnesses not listed below for the  
 10 purpose of authenticating exhibits, to the extent the parties are not able to reach agreement  
 11 regarding such issues.  
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 14 Should any witness whose testimony Plaintiffs anticipate presenting live be  
 15 unavailable for trial for any reason, Plaintiffs reserve the right to present such witness by  
 16 deposition testimony.

17 **I. Fact Witnesses**

PLAINTIFFS		
Name	Address	Expected Testimony
Suleiman Abdullah Salim	Bet Ras Zanzibar, Tanzania	Plaintiff Salim will testify to the abusive treatment he endured in COBALT, where he was subjected to Defendants' experimental torture program, as described in paragraphs 71-116 of the Complaint. He will testify to the long-term effects of what he endured in COBALT on his physical and mental health. And he is prepared to testify, as necessary, about facts relevant to any affirmative defense Defendants intend to raise at trial, such as the statute of limitations.

1 2 3 4 5 6 7	Mohamed Ahmed Ben Soud	Mahallat Shate'e Al-Nakhil Misrata, Libya	Plaintiff Ben Soud will testify to the abusive treatment he endured in COBALT, where he was subjected to Defendants' experimental torture program, as described in paragraphs 117-154 of the Complaint. He will testify to the long-term effects of what he endured in COBALT on his physical and mental health. And he is prepared to testify, as necessary, about facts relevant to any affirmative defense Defendants intend to raise at trial, such as statute of limitations.
8 9 10 11	ObaidUllah (as personal representative of Gul Rahman)	Deputy Ministry of Tvet Karte 4 Dehboori Kabul, Afghanistan	Plaintiff ObaidUllah will testify as to the effect on his family resulting from the death of his uncle, Gul Rahman, who endured abusive treatment as COBALT, where he was subjected to Defendants' experimental torture program, as described in paragraphs 155-167 of the Complaint.

**DEFENDANTS**

<b>Name</b>	<b>Address</b>	<b>Expected Testimony</b>
15 16 17 18 19 20 21 22 23 24	John Bruce Jessen 8719 S. Palouse Highway Spokane, Washington 99223-3011	Subject to his deposition, which has not yet occurred, Defendant Jessen will testify to the design, development (including through testing on Abu Zubaydah), evaluation, and implementation of Defendants' experimental torture program, to the profits he received from his work in the torture program, to his involvement in the interrogations of Gul Rahman, as well as regarding any testimony relevant to affirmative defenses he intends to raise at trial.
25 26	James Elmer Mitchell 20727 Lake Vienna DR Land O Lakes, Florida 34638-8334	Subject to his deposition, which has not yet occurred, Defendant Mitchell will

testify to the design, development (including through testing on Abu Zubaydah), evaluation, and implementation of Defendants' experimental torture program, to the profits he received from his work in the torture program, to his involvement in the interrogations of Gul Rahman, as well as any testimony relevant to affirmative defenses he intends to raise at trial.

## II. Expert Witnesses

Name	Address	Expected Testimony
Matthew Friedman, M.D., Ph.D.	National Center for PTSD White River Junction, VT 05009	Matthew Friedman, M.D., Ph.D., will testify to the matters set forth in his expert report.
Charles A. Morgan, III, M.D., M.A.	University of New Haven 300 Boston Post Rd West Haven, CT 06516	Charles A. Morgan, III, M.D., M.A., will testify to the matters set forth in his expert report.
Christopher Einolf, Ph.D.	DePaul University 14 E. Jackson Chicago, IL 60604	Christopher Einolf, Ph.D., will testify to the matters set forth in his expert report.
Sondra S. Crosby, M.D.	Boston University School of Medicine 72 East Concord St. Boston, MA 02118	Sondra Crosby, M.D., will testify to the matters set forth in her expert report.
Allen S. Keller, M.D.	New York University School of Medicine 462 First Avenue New York, NY 10016	Allen S. Keller, M.D., will testify to the matters set forth in his expert report.
Kevin J. Heller, J.D., Ph.D.	SOAS University of London Thornhaugh Street Russell Square London WC1H 0XG	Kevin J. Heller, J.D., Ph.D., will testify to the matters set forth in his expert report.

<p>1 Brock Chisholm, Bsc  2 (Hons), Msc, DClin  3 (psych) CPsychol  4 AFBPsS</p>	<p>Criterion A Psychology Services  London, U.K.</p>	<p>Brock Chisholm, Bsc (Hons),  Msc, DClin (psych),  Cpsychol AFBPsS, will  testify to the matters set forth  in his expert report.</p>
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16 *Attorneys for Plaintiffs*

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26 DATED: November 21, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2016, I caused to be electronically filed and served the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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