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16 GIBBONS P.C.

17 *Attorneys for Plaintiffs*

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),

24 Plaintiffs,

25 v.

26 JAMES ELMER MITCHELL and JOHN
"BRUCE" JESSEN

Defendants.

2:15-CV-286-JLQ

DECLARATION OF
DROR LADIN IN
OPPOSITION TO
DEFENDANTS'
MOTION TO
DISMISS

January 19, 2017
With Telephonic Oral
Argument
10:00 a.m. PST

1 I, Dror Ladin, a member of the Bar of the State of New York and admitted
2 *pro hac vice* to the Bar of this Court, declare under penalty of perjury as follows:
3

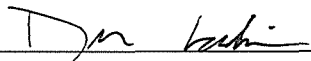
4 1. I am an attorney with the American Civil Liberties Union Foundation,
5 and represent Plaintiffs in this matter. I submit this declaration in opposition to
6 Defendants' Motion to Dismiss.
7

8 2. Attached hereto as Exhibit A is a true and correct copy of the August
9 17, 2008 Certificate for Release of SULEIMAN ((ABDULLAH)), S/O FNU
10 ((ABDULLAH)), provided by the United States to Plaintiff Salim.
11

12 3. Attached hereto as Exhibit B is a true and correct copy of a document
13 produced by the Department of Defense pursuant to the Freedom of Information
14 Act, titled "Annex E (Unlawful Enemy Combatant Review Board (UECRB), to
15 the CJTF-101 Detainee Operations Standard Operating Procedures."
16

17 * * *

18 I declare under penalty of perjury that the foregoing is true and correct.
19

20
21 
22 Dror Ladin

23 Dated: December 9, 2016
24 New York, New York
25
26