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Attorneys for Defendants Mitchell and Jessen

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE**

SULEIMAN ABDULLAH SALIM,
MOHAMED AHMED BEN SOUD,
OBAID ULLAH (as personal
representative of GUL RAHMAN),

Plaintiffs,

vs.

JAMES ELMER MITCHELL and
JOHN "BRUCE" JESSEN,

Defendants.

NO. 2:15-CV-286-JLQ

DECLARATION OF BRIAN S.
PASZAMANT IN SUPPORT OF
DEFENDANTS' MOTION TO
TAKE JUDICIAL NOTICE

DECLARATION BRIAN S. PASZAMANT
IN SUPPORT OF DEFENDANTS'
MOTION TO TAKE JUDICIAL NOTICE
NO. 2:15-CV-286-JLQ

Betts
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701 Pike Street, Suite 1400
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(206) 292-9988

1 I, Brian Paszamant, hereby certify under penalty of perjury, that the
2 following is true and correct and within my personal knowledge:

3 1. I am over the age of 18, have personal knowledge of all facts
4 contained in this declaration, and am competent to testify as a witness to those
5 facts.

6 2. I am one of the attorneys representing Defendants James Elmer
7 Mitchell and John "Bruce" Jessen in this action.

8 3. On May 18, 2017, I asked Plaintiffs, through their counsel, Lawrence
9 S. Lustberg, to stipulate to the following facts:

10 a. A terrorist attack occurred on September 11, 2001 at the World
11 Trade Center in New York City, New York, the Pentagon in
12 Arlington, Virginia and on Flight 93, which crashed near
13 Shanksville, Pennsylvania (the "9/11 Attacks");

14 b. The 9/11 Attacks were planned and carried out by the terrorist
15 group al-Qaeda; and

16 c. 2,996 people were killed and over 5,000 people were injured as a
17 result of the 9/11 Attacks.

18 4. On May 19, 2017, attorney Lustberg responded to my request that his
19 clients so stipulate, refusing to so stipulate.

20 5. No further correspondence on this matter has occurred.
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27 DECLARATION BRIAN S. PASZAMANT
28 IN SUPPORT OF DEFENDANTS'
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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the
2 laws of the United States that the foregoing is true and correct.

3 s/ Brian S. Paszamant
4 Brian S. Paszamant

5 Executed this 22nd day of May, 2017
6 at Philadelphia, PA.
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27 DECLARATION BRIAN S. PASZAMANT
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- 3 -

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Emily Chiang echiang@aclu-wa.org ACLU of Washington Foundation 901 Fifth Ave, Suite 630 Seattle, WA 98164	Paul Hoffman hoffpaul@aol.com Schonbrun Seplow Harris & Hoffman, LLP 723 Ocean Front Walk, Suite 100 Venice, CA 90291
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By s/ Karen L. Pritchard
 Karen L. Pritchard
kpritchard@bpmlaw.com
 Betts, Patterson & Mines, P.S

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