

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

SULEIMAN ABDULLAH SALIM, et
al.

Plaintiffs,

v.

JAMES ELMER MITCHELL and
JOHN "BRUCE" JESSEN,

Defendants.

NO. 2:15-cv-286-JLQ

DECLARATION OF JULIAN G. KU
IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

I, Julian G. Ku, hereby certify under penalty of perjury, that the following is true and correct and within my personal knowledge:

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

2. I am the Maurice A. Deane Distinguished Professor of Constitutional Law for the Maurice A. Deane School of Law at Hofstra University in Hempstead, New York. A copy of my curriculum vitae is attached hereto as Exhibit 1.

3. I have been asked by Blank Rome LLP, attorneys for Defendants James Mitchell and John "Bruce" Jessen (collectively, "Defendants"), to provide expert opinions in connection with the above-captioned action.

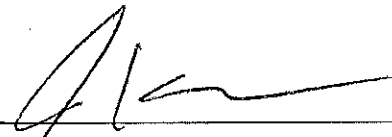
4. A copy of my December 12, 2016 expert opinion (the "Opinion") in the above-captioned action is attached hereto as Exhibit 2.

5. A copy of my March 16, 2017 expert sur-rebuttal opinion (the “Sur-Rebuttal Opinion”) is attached hereto as **Exhibit 3**.

6. The conclusions expressed in my Opinion and Sur-Rebuttal Opinion are given within a reasonable degree of professional certainty.

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

Dated: May 16, 2017

By: 

Professor Julian G. Ku

DECLARATION OF PROFESSOR JULIAN G. KU

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May, 2017, I electronically filed the foregoing document, Declaration of Julian G. Ku in Support of Defendants' Motion for Summary Judgment, with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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By s/ Shane Kangas
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