

# **Exhibit 71**

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON**

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

**PLAINTIFF SULEIMAN ABDULLAH  
SALIM'S OBJECTIONS AND RESPONSES  
TO DEFENDANTS' INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Suleiman Abdullah Salim ("Plaintiff" or "Mr. Salim") hereby submits the following responses and objections to the Interrogatories served by Defendants James Elmer Mitchell and John "Bruce" Jessen

**RESPONSES TO DEFENDANT MITCHELL'S INTERROGATORIES**

**Interrogatory No. 1:** Please advise whether you ever met and/or were in the same room as either or both Defendants. For any such instances, please:

- a. Identify which Defendant was involved in each such encounter;
- b. Identify any other individuals present during any such encounter(s);
- c. Identify when such encounter(s) occurred;
- d. Identify where such encounter(s) occurred;
- e. Summarize what actions each Defendant took during such encounter(s);
- f. Summarize anything that each Defendant said during any such encounter(s);
- g. Summarize what actions any third-party took during any such encounter(s); and
- h. Summarize anything that any third-party said during any such encounter(s).

**Response:** Plaintiff objects to this Interrogatory on the grounds that it is overbroad and seeks information that is not relevant to any party's claim or defense in this case, insofar as the request lacks any temporal or substantive limitation. Plaintiff further objects to this Interrogatory on the grounds that it seeks information that Defendants would be in a superior position to identify, such as Defendants' presence in certain places or their own words in purported conversations.

Subject to and without waiver of the foregoing general and specific objections, Mr. Salim responds that he does not aver that he was ever in the same room as either Defendant.

**Interrogatory No. 7:** If you or any of your representatives have filed any lawsuits, claims, applications and/or other submissions seeking damages for any injuries that you attribute to your inclusion in the Program and/or Defendant's acts or omissions (other than in this action), please provide the full case caption and docket number (if a lawsuit), date of claim and entity against whom claim was asserted, the names of any entities with whom a settlement has been reached or from whom payment has been received, and the dollar amount of each settlement and/or payment received.

**Response:** Subject to and without waiver of the foregoing general objections, Mr. Salim responds that neither Mr. Salim nor any representative of Mr. Salim has ever filed any lawsuit, claim, application, or other submission seeking damages for any injuries attributable to inclusion in the Program and/or Defendants' acts or omissions other than this action.

**Interrogatory No. 8:** Please itemize any damages sought or claimed by you in this action, whether compensatory, punitive or exemplary, and identify the component parts and method of calculating such damages.

**Response:** Subject to and without waiver of the foregoing general objections, Mr. Salim responds that he has not claimed specific damages and leaves the calculation of damages to the Court at trial.

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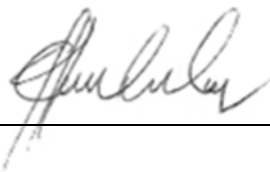
*Attorneys for Plaintiffs*

Dated: November 28, 2016

**CERTIFICATION**

I, Suleiman Abdullah Salim, hereby certify that, to the best of my knowledge and belief, the foregoing answers to Defendants' Interrogatories are accurate. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: November 28, 2016

By:  \_\_\_\_\_

Name: Suleiman Abdullah Salim

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2016, I caused to be served a copy of the foregoing on the following individuals via email:

Brian S. Paszamant:  
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