

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

OBAID ULLAH, AMERICAN CIVIL
LIBERTIES UNION, and AMERICAN CIVIL
LIBERTIES UNION FOUNDATION,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendants.

No. 18-cv-2785-JEB

**DECLARATION OF DROR LADIN IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

I, Dror Ladin, pursuant to 28 U.S.C. § 1746, hereby declare and state under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney at the American Civil Liberties Union Foundation and co-counsel for Plaintiffs the American Civil Liberties Union and the American Civil Liberties Union Foundation (together, the "ACLU") in the above-titled action.
2. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.
3. Attached hereto as Exhibit 1 is a true and correct copy of a document produced by Defendant CIA pursuant to a previous ACLU FOIA Request, titled "Eyes Only – Additional Operational and Security Considerations for the Next Phase of Abu Zubaydah Interrogation" and labeled with CADRE number C06541506. The document was approved for release on June 10, 2016.

4. Attached hereto as Exhibit 2 is a true and correct copy of a document produced by Defendant CIA pursuant to a previous ACLU FOIA Request, titled “Eyes Only – HQs Feedback on Issues Pending for Interrogations of Abu Zubaydah” and labeled with CADRE number C06541507. The document was approved for release on August 13, 2018.

5. Attached hereto as Exhibit 3 is a true and correct copy of a document produced by Defendant CIA pursuant to Plaintiffs’ FOIA Request in this matter, titled “Chronology of Significant Events” and labeled with CADRE number C06630281. The document was approved for release on May 29, 2019.

6. Attached hereto as Exhibit 4 is a true and correct copy of a document produced by Defendant CIA pursuant to a third-party subpoena in *Salim v. Mitchell*, 2:15-cv-00286-JLQ (E.D. Wash. 2017), titled “Chronology of Significant Events” and labeled with U.S. Bates numbers 001547–001549. The document was approved for release December 20, 2016.

Dated: October 28, 2019
New York, New York

/s/ Dror Ladin
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