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*Attorneys for Defendants Mitchell and Jessen*

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

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

22 Plaintiffs,

23 vs.

24 JAMES ELMER MITCHELL and  
25 JOHN "BRUCE" JESSEN,

Defendants.

NO. 2:15-CV-286-JLQ

DECLARATION OF  
ARIEL S. GLASNER IN SUPPORT  
OF DEFENDANTS' MOTION TO  
EXCLUDE EXPERT OPINIONS

DECLARATION OF ARIEL S. GLASNER  
IN SUPPORT OF DEFENDANTS'  
MOTION TO EXCLUDE EXPERT  
OPINIONS  
NO. 2:15-CV-286-JLQ

Betts  
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**One Convention Place**  
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(206) 292-9988

1 I, Ariel S. Glasner, 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

7 2. I am an attorney at the law firm of Blank Rome LLP, and am one of  
8 the attorneys representing Defendants James Elmer Mitchell and John "Bruce"  
9 Jessen (collectively, "Defendants") in the above-captioned action.

10 3. Attached hereto as **Exhibit 1** [REDACTED]  
11 [REDACTED]

12 4. Attached hereto as **Exhibit 2** is a true and correct copy of testimony  
13 excerpts taken from the deposition of Dr. Sondra Crosby dated April 28, 2017.

14 5. Attached hereto as **Exhibit 3** [REDACTED]  
15 [REDACTED].

16 6. Attached hereto as **Exhibit 4** is a true and correct copy of the expert  
17 report dated November 21, 2016, prepared by Dr. Matthew Friedman.

18 7. Attached hereto as **Exhibit 5** is a true and correct copy of testimony  
19 excerpts taken from the deposition of Dr. Matthew Friedman dated April 28, 2017.

20 8. Attached hereto as **Exhibit 6** is a true and correct copy of the expert  
21 report dated November 21, 2016, prepared by Dr. Charles Morgan.

22 9. Attached hereto as **Exhibit 7** [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

1           10. Attached hereto as **Exhibit 8** is a true and correct copy of testimony  
2 excerpts taken from the deposition of Dr. Brock Chisholm dated April 27, 2017.

3           11. Attached hereto as **Exhibit 9** is a true and correct copy of testimony  
4 excerpts taken from the deposition of Plaintiff Suleiman Abdullah Salim dated  
5 March 14, 2017.  
6

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

9           DATED this 14th day of July, 2017, at Washington, D.C.

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12           Ariel S. Glasner  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of July, 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:

<p>Emily Chiang  <a href="mailto:echiang@aclu-wa.org">echiang@aclu-wa.org</a>          ACLU of Washington Foundation          901 Fifth Ave, Suite 630          Seattle, WA 98164</p>	<p>Paul Hoffman  <a href="mailto:hoffpaul@aol.com">hoffpaul@aol.com</a>          Schonbrun Seplow Harris &amp; Hoffman, LLP          723 Ocean Front Walk, Suite 100          Venice, CA 90291</p>
<p>Andrew I. Warden  <a href="mailto:Andrew.Warden@usdoj.gov">Andrew.Warden@usdoj.gov</a>          Senior Trial Counsel          Timothy A. Johnson  <a href="mailto:Timothy.Johnson4@usdoj.gov">Timothy.Johnson4@usdoj.gov</a>          Trial Attorney          United States Department of Justice          Civil Division, Federal Programs Branch          20 Massachusetts Ave NW          Washington, DC 20530</p>	<p>Steven M. Watt, admitted <i>pro hac vice</i>  <a href="mailto:swatt@aclu.org">swatt@aclu.org</a>          Dror Ladin, admitted <i>pro hac vice</i>  <a href="mailto:dladin@aclu.org">dladin@aclu.org</a>          Hina Shamsi, admitted <i>pro hac vice</i>  <a href="mailto:hshamsi@aclu.org">hshamsi@aclu.org</a>          ACLU Foundation          125 Broad Street, 18th Floor          New York, NY 10007</p>
<p>Avram D. Frey, admitted <i>pro hac vice</i>  <a href="mailto:afrey@gibbonslaw.com">afrey@gibbonslaw.com</a>          Daniel J. McGrady, admitted <i>pro hac vice</i>  <a href="mailto:dmcgrady@gibbonslaw.com">dmcgrady@gibbonslaw.com</a>          Kate E. Janukowicz, admitted <i>pro hac vice</i>  <a href="mailto:kjanukowicz@gibbonslaw.com">kjanukowicz@gibbonslaw.com</a>          Lawrence S. Lustberg, admitted <i>pro hac vice</i>  <a href="mailto:llustberg@gibbonslaw.com">llustberg@gibbonslaw.com</a>          Gibbons PC          One Gateway Center          Newark, NJ 07102</p>	<p>Anthony DiCaprio, admitted <i>pro hac vice</i>  <a href="mailto:ad@humanrightslawyers.com">ad@humanrightslawyers.com</a>          Law Office of Anthony DiCaprio          64 Purchase Street          Rye, NY 10580</p>

By           s/ Shane Kangas            
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DECLARATION OF ARIEL S. GLASNER  
IN SUPPORT OF DEFENDANTS’  
MOTION TO EXCLUDE EXPERT  
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