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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

No. 2:15-CV-286-JLQ

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

Plaintiffs,

v.

JAMES ELMER MITCHELL and JOHN  
"BRUCE" JESSEN,  
Defendants.

\*\*\*\*\*

CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF  
SONDRA CROSBY, MD

Friday, April 28th, 2017  
9:08 a.m.

Held At:  
WilmerHale  
60 State Street  
Boston, Massachusetts

REPORTED BY:  
Maureen O'Connor Pollard, RMR, CLR, CSR

1 and have been trained to use scales such as  
2 CAPS, Harvard Trauma Questionnaire, Beck  
3 Depression Index, Hopkins Symptom Checklist,  
4 Refugee Health Screener.

5 Q. Did you use any of those instruments  
6 in this case, in your work in this case?

7 A. For Mr. Salim, no. On my last visit I  
8 did not.

9 Q. All right. Let me broaden the  
10 question.

11 Did you use any of those testing  
12 instruments with Mr. Salim in any of your  
13 contact with him?

14 A. I used some when I had an interpreter  
15 in 2010.

16 Q. And what did you use?

17 A. I'd have to refresh my memory with my  
18 report. But I believe I used the Beck  
19 Depression Index, and perhaps the Harvard Trauma  
20 Questionnaire.

21 Q. I have a full box full of paper, and  
22 it was supposed to have your report.

23 MR. TOMPKINS: There are actually  
24 multiple copies of that report in the box

1 the assessment in October of 2016 without a  
2 translator?

3 A. At the time Mr. Salim did not feel  
4 comfortable with any local translators, and I  
5 did not have a translator from outside of the  
6 country.

7 Q. And the interview was conducted where?

8 A. In Dar es Salaam.

9 Q. When you say -- well, was it your  
10 intent when you went to Dar es Salaam for this  
11 assessment to have a translator involved?

12 A. It was not. I felt I could do an  
13 evaluation with Mr. Salim without a translator.

14 Q. So you believed that you knew in  
15 advance of that interaction that his English  
16 would be sufficient to permit you to do the  
17 assessment without a translator?

18 A. That was my opinion before I went,  
19 yes.

20 Q. Okay. And that was based on  
21 continuing contact that you had had with him  
22 after 2010 and before October, 2016?

23 A. I would say it was based on my general  
24 knowledge of and conversations with Mr. Salim.

1 Q. Well, let's come back to my question.  
2 It was based on your continuing  
3 contact with Mr. Salim between 2010 and 2016,  
4 wasn't it?

5 MR. HOFFMAN: Objection.  
6 You can answer.

7 A. It was based partly on that, and  
8 partly based on information I was given about  
9 other people meeting with him who were able to  
10 converse in English. So the issue -- the  
11 question certainly did arise.

12 BY MR. TOMPKINS:

13 Q. "It was based partly on information I  
14 was given about other people meeting with him  
15 who were able to converse in English."

16 All right. Who does that -- who are  
17 you talking about?

18 A. His attorneys.

19 Q. And who specifically?

20 A. I'm sorry, I didn't hear you.

21 Q. Who specifically? Which attorneys?

22 A. Mr. Watt.

23 Q. You had numerous contacts and  
24 communications with Mr. Salim between 2010 and

1 A. Yes, sir.

2 Q. Can you tell me if -- well, Ms. Kituyi  
3 wrote a report about her involvement with  
4 Mr. Salim in 2010, correct?

5 A. The only document I saw from her was a  
6 very brief document, I don't even recall the  
7 contents of it.

8 Q. Okay. Do you know whether she  
9 wrote -- whatever that document was, and that, I  
10 think, is what I'm referring to, you may not  
11 consider it a report, but whatever we call that  
12 document, was it written independently from the  
13 report that you wrote of that assessment?

14 A. Yes. Yes.

15 Q. Do you have any knowledge why there  
16 would be substantially similar, if not exact,  
17 language in those two documents?

18 A. I have no idea, sir.

19 MR. TOMPKINS: Verbatim would have  
20 been a good word whoever said it, but it didn't  
21 come to me. Was that you, Roger? Are you  
22 helping me out over here?

23 A. Do you have a copy of that report?  
24 I'm happy to take a look at it.

1 Q. I think I do. But if you don't know  
2 why there would be identical or verbatim -- or  
3 similar or verbatim language, then I don't need  
4 to get it out. I'm sure that counsel for  
5 Mr. Salim can share it with you later.

6 Let me ask you this, because I think  
7 you do reference in your report that you relied  
8 on that report to some extent for your opinions  
9 in this case. It sounds to me like you have  
10 very little knowledge or memory of either that  
11 report or Ms. Kituyi, is that correct?

12 A. As I stated, I never met her, I've  
13 never had any direct communication with her. I  
14 did have a copy of the document we're referring  
15 to, and I did look at it as a piece of  
16 information when I wrote my report.

17 Q. Do you recall any specific  
18 contribution that it made to your development of  
19 your opinions in this case?

20 A. I don't recall.

21 Q. You've referenced a couple of times  
22 efforts to obtain treatment for Mr. Salim after  
23 your 2010 assessment of him, right?

24 A. Yes, sir.

1 BY MR. TOMPKINS:

2 Q. Okay. Can you speak on behalf of the  
3 internist community which does work in assessing  
4 individuals for PTSD?

5 A. My expertise is in the context of  
6 torture. And I can tell you what my views are  
7 after treating people with trauma and torture  
8 for 17 years and trying to understand the  
9 literature and speaking with psychologists and  
10 psychiatrists who work in this field.

11 Q. Okay. And I appreciate that. But at  
12 the moment I'm not so much interested in your  
13 personal views as I am the views of the larger  
14 internist community.

15 And I take it from your answer that  
16 you're not prepared to give us the scorecard  
17 within that community?

18 A. No, I'm not sure there is a scorecard  
19 within that community.

20 Q. Would you agree that complex PTSD is  
21 not currently accepted as a valid diagnosis  
22 within the psychiatric community?

23 A. It certainly is not in the DSM-5.

24 Q. Okay. And I'll ask you the same