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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

SULEIMAN ABDULLAH SALIM,  
MOHAMED AHMED BEN SOUD,  
OBAIDULLAH (AS PERSONAL  
REPRESENTATIVE OF GUL RAHMAN),

Plaintiffs,

v.

JAMES ELMER MITCHELL and JOHN  
"BRUCE" JESSEN

Defendants.

2:15-CV-286-JLQ

**DECLARATION OF  
KATE JANUKOWICZ**

Without Argument

NOTE ON MOTION  
CALENDAR:  
August 18, 2017

1 I, Kate E. Janukowicz, a member of the Bars of the States of New York  
2 and New Jersey and admitted *pro hac vice* to the Bar of this Court, declare under  
3 penalty of perjury as follows:  
4

5 1. I am an attorney with Gibbons P.C., co-counsel for Plaintiffs in this  
6 matter. I submit this declaration in support of Plaintiffs' Opposition to  
7 Defendants' Motion to Exclude Expert Opinions.  
8

9 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts  
10 from the deposition of Dr. Sondra Crosby, dated April 28, 2017.  
11

12 3. Attached hereto as **Exhibit B** is a true and correct copy of the  
13 curriculum vitae for Dr. Sondra Crosby.  
14

15 4. Attached hereto as **Exhibit C** is a true and correct copy of Dr. Sondra  
16 Crosby's Rebuttal Report, dated April 7, 2017.  
17

18 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts  
19 from the expert report of Roger K. Pitman, M.D. as to Suleiman Abdullah  
20 Salim, dated and disclosed by Defendants on March 24, 2017.  
21

22 6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts  
23 from the expert report of Joseph Carter, M.D. as to Suleiman Abdullah Salim,  
24 dated and disclosed by Defendants on February 13, 2017.  
25

26 7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts  
from the expert report of Joseph D. Zuckerman, M.D. as to Suleiman Abdullah

1 Salim, dated and disclosed by Defendants on March 9, 2017.

2 8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts  
3  
4 from the deposition of Matthew J. Friedman, M.D. dated April 28, 2017.


5 9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts  
6  
7 from the deposition of James E. Mitchell, dated January 16, 2017.

8 10. Attached hereto as **Exhibit I** is a true and correct copy of excerpts  
9  
10 from the deposition of John Bruce Jessen, dated January 20, 2017.

11 11. Attached hereto as **Exhibit J** is a true and correct copy of excerpts of  
12  
13 a draft manuscript produced by Defendant Mitchell pursuant to Plaintiffs'  
14 discovery request, titled "Interrogating the Enemy."

15 \* \* \*

16 I declare under penalty of perjury that the foregoing is true and correct.

17  
18   
19 Kate Janukowicz

20 Dated: July 28, 2017  
21 Newark, New Jersey  
22  
23  
24  
25  
26



## CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July, 2017, I caused to be electronically filed and served the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Andrew I. Warden <a href="mailto:andrew.warden@usdoj.gov">andrew.warden@usdoj.gov</a>	Timothy Andrew Johnson <a href="mailto:Timothy.johnson4@usdoj.gov">Timothy.johnson4@usdoj.gov</a>
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<i>Attorneys for Defendants</i>	

s/ Kate E. Janukowicz  
 Kate E. Janukowicz (admitted *pro hac vice*)  
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