

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF WASHINGTON

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

6 Plaintiffs,

7
8 v.

9 JAMES ELMER MITCHELL and JOHN
10 "BRUCE" JESSEN

11 Defendants.

No. 15-cv-0286 (JLQ)

STIPULATION TO
CONDUCT TRIAL
DEPOSITION OF
MOHAMED BEN SOUD

12
13 **WHEREAS**, Plaintiff Mohamed Ben Soud is unavailable to testify live at
14 trial; and

15
16 **WHEREAS**, a trial deposition is the most reasonable alternative to Mr.
17 Ben Soud's testimony at trial; and

18 **WHEREAS**, the parties raised the prospect of conducting a trial
19 deposition of Mr. Ben Soud during oral argument on July 28, 2017, and, the
20 Court having directed counsel to submit this stipulation:

21 **IT IS HEREBY STIPULATED AND ORDERED THAT:**

- 22
- 23 1. The parties will conduct a Trial Deposition for Mr. Ben Soud to be
24 taken in Roseau, Dominica on **August 11, 2017**, at a time to be agreed
25 upon by the parties.
 - 26 2. The parties will submit any disputes regarding objections raised in the

1 course of Mr. Ben Soud's deposition to the Court on or before **August**
2 **21, 2017**, so that the Court may address them in advance of trial.

3
4 **STIPULATED AGREED TO BY:**

5 By: s/ Lawrence S. Lustberg
6 Lawrence S. Lustberg (*pro hac vice*)
7 Kate E. Janukowicz (*pro hac vice*)
8 Daniel J. McGrady (*pro hac vice*)
9 Avram D. Frey (*pro hac vice*)
10 GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102

By: s/ Christopher W. Tompkins
Christopher W. Tompkins (WSBA
#11686)
BETTS, PATTERSON &
MINES P.S.
701 Pike Street, Suite 1400
Seattle, WA 98101-3927

11 Dror Ladin (*admitted pro hac vice*)
12 Steven M. Watt (*admitted pro hac vice*)
13 Hina Shamsi (*admitted pro hac vice*)
14 AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street, 18th Floor
15 New York, New York 10004

Henry F. Shuelke III (*pro hac vice*)
James T. Smith (*pro hac vice*)
Brian S. Paszamant (*pro hac vice*)
Jeffrey N. Rosenthal (*pro hac vice*)
BLANK ROME LLP
One Logan Square
130 N. 18th St., N.W.
Philadelphia, PA 19103

16 Emily Chiang, WSBA No. 50517
17 echiang@aclu-wa.org
18 AMERICAN CIVIL LIBERTIES UNION
OF WASHINGTON FOUNDATION
19 901 Fifth Avenue, Suite 630
20 Seattle, WA 98164
21 Phone: 206-624-2184

Attorneys for Defendants

22 Paul Hoffman (*admitted pro hac vice*)
23 SCHONBRUN DESIMONE SEPLOW
24 HARRIS & HOFFMAN, LLP
25 723 Ocean Front Walk, Suite 100
Venice, CA 90291

26 *Attorneys for Plaintiffs*

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Pursuant to the foregoing stipulation, it is so ORDERED.

Dated this ____ day of _____, 2017.

Hon. Justin L. Quackenbush
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on the 31st 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
andrew.warden@usdoj.gov

Attorney for the United States of America

Brian S. Paszamant:
Paszamant@blankrome.com

Henry F. Schuelke, III:
Hschuelke@blankrome.com

James T. Smith:
Smith-Jt@blankrome.com

Christopher W. Tompkins:
Ctompkins@bpmlaw.com

Attorneys for Defendants

s/ Lawrence S. Lustberg
Lawrence S. Lustberg (admitted *pro hac vice*)
LLustberg@gibbonslaw.com