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Attorneys for Plaintiffs

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
DANIEL J. MCGRADY**

Without Argument

Motion Hearing:
Pretrial Conference
August 21, 2017 at 10:00 am
Spokane, Washington

1 I, Daniel J. McGrady, 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' Motions in Limine.
7

8 2. Attached hereto as **Exhibit A** is a true and correct copy of a document
9 produced by the CIA pursuant to Defendants' subpoena, titled "Subject: DOD
10 Approval to Render [Abd Al-Karim] to [Foreign Government]" and labelled
11 with U.S. Bates numbers 001545 to 001546.
12

13 3. Attached hereto as **Exhibit B** is a true and correct copy of Defendants'
14 Exhibit 679, "9/11 Newspaper Clippings."
15

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

20 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts
21 from the expert report of Roger K. Pitman, M.D. as to Mohamed Ben Soud,
22 dated and disclosed by Defendants on March 24, 2017.
23

24 6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts
25 from Volume I of the deposition of Suleiman Abdullah Salim, dated March 14,
26 2017.

1 7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts
2 from Volume I of the deposition of Mohamed Ben Soud, dated January 31,
3 2017.
4

5 8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts
6 from the deposition of ObaidUllah, dated January 31, 2017.
7

8 9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts
9 from the Senate Select Committee on Intelligence: *Committee Study of the*
10 *Central Intelligence Agency's Detention and Interrogation Program.*
11

12 * * *

13 I declare under penalty of perjury that the foregoing is true and correct.
14

15 

16

Daniel J. McGrady

17 **Dated:** August 2, 2017
18 Newark, New Jersey
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of August, 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:

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