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8 Dror Ladin (admitted *pro hac vice*)  
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12 Lawrence S. Lustberg (admitted *pro hac vice*)  
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14 Daniel J. McGrady (admitted *pro hac vice*)  
15 Avram D. Frey (admitted *pro hac vice*)  
16 GIBBONS P.C.

17 *Attorneys for Plaintiffs*

18 UNITED STATES DISTRICT COURT  
19 FOR THE EASTERN DISTRICT OF WASHINGTON

20 SULEIMAN ABDULLAH SALIM,  
21 MOHAMED AHMED BEN SOUD, OBAID  
22 ULLAH (AS PERSONAL  
23 REPRESENTATIVE OF GUL RAHMAN),

24 Plaintiffs,

25 v.

26 JAMES ELMER MITCHELL and JOHN  
"BRUCE" JESSEN

Defendants.

2:15-CV-286-JLQ

DECLARATION OF DROR LADIN IN OPPOSITION TO DEFENDANTS' MOTIONS IN LIMINE AND REQUEST FOR JUDICIAL NOTICE

NOTE ON MOTION CALENDAR:

August 21, 2017,  
9:30 A.M., AT  
SPOKANE, WASHINGTON

1 I, Dror Ladin, a member of the Bar of the State of New York and admitted  
2 *pro hac vice* to the Bar of this Court, declare under penalty of perjury as follows:

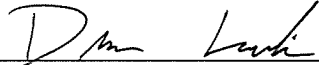
3  
4 1. I am an attorney with the American Civil Liberties Union Foundation,  
5 and represent Plaintiffs in this matter. I submit this declaration in opposition to  
6 Defendants’ Motions in Limine and Request for Judicial Notice  
7

8 2. Attached hereto as Exhibit A is a true and correct copy of excerpts of a  
9 draft manuscript produced by Defendant Mitchell pursuant to Plaintiffs’  
10 discovery request, titled “Interrogating the Enemy” and labelled with Bates  
11 numbers MJ00022600, MJ0022630.  
12

13 3. Attached hereto as Exhibit B is a true and correct copy of excerpts of  
14 the deposition transcript of James Elmer Mitchell, dated January 16, 2017.  
15

16 \* \* \*

17 I declare under penalty of perjury that the foregoing is true and correct.  
18

19  
20   
21 Dror Ladin

22 Dated: August 10, 2017  
23 New York, New York  
24  
25  
26

**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 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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<i>Attorneys for Defendants</i>	

*s/ Dror Ladin*  
Dror Ladin (admitted *pro hac vice*)  
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