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18 Attorneys for Plaintiffs

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

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

2:15-CV-286-JLQ

25 Plaintiffs,

26 v.

DECLARATION OF
DROR LADIN

JAMES ELMER MITCHELL and JOHN
"BRUCE" JESSEN

Defendants.

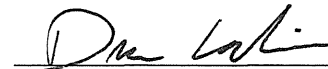
1 I, Dror Ladin, a member of the Bar of the State of New York and admitted
2 *pro hac vice* to the Bar of this Court, declare under penalty of perjury as follows:
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5 1. I am an attorney with the American Civil Liberties Union Foundation,
6 and represent Plaintiffs in this matter. I submit this declaration in support of
7
8 Plaintiffs' Opposition to Defendants' Motions to Dismiss.

9 2. Attached hereto as Exhibit A is a true and correct copy of the
10
11 September 24, 2015 Order Granting Letters of Administration of the Superior
12
13 Court of Washington for Spokane County, appointing Mr. Obaid Ullah as the
14
15 Personal Representative of the Estate of Gul Rahman.

16 * * *

17 I declare under penalty of perjury that the foregoing is true and correct.
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20 _____
21 Dror Ladin

22 Dated: February 11, 2016

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EXHIBIT A

COPY
ORIGINAL FILED

SEP 24 2015

SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF WASHINGTON FOR SPOKANE COUNTY

Estate of

MR. GUL RAHMAN,

Deceased.

NO. 15401355-8

**ORDER GRANTING LETTERS OF
ADMINISTRATION**

Mr. Obaid Ullah's Petition for Letters of Administration has come on for hearing today, and it appears to the Court that said petition sets forth facts essential to give this Court jurisdiction. The court finds as follows:

Mr. Gul Rahman died intestate in Afghanistan on or about November 20, 2002, a resident of the Shamshatoo Refugee Camp, Peshawar, Pakistan. The estate outside Washington is likely insolvent and the only asset within the state of Washington is a cause of action arising from the circumstances of his death.

Petitioner is qualified to act as the personal representative of this estate. Petitioner is not seeking non-intervention powers.

THEREFORE, IT IS ORDERED that:

1. Mr. Obaid Ullah is hereby appointed as the Personal Representative of the above-referenced estate and Letters of Administration shall be issued.

2. The Personal Representative may take such action as he deems appropriate to determine, marshal and protect the assets of the estate located within the state of Washington,

1 including the bringing of such actions in state or federal court located in the state of Washington
2 as the Personal Representative deems appropriate and in the best interests of the estate.

3 3. The personal representative shall not sell, exchange, lease or mortgage estate
4 assets or borrow on behalf of the estate except in compliance with the provisions of
5 Chapter RCW 11.56; shall file interim reports at least annually and a final report in compliance
6 with RCW 11.76.010; and in the event any liquid assets of the estate are found or realized, shall
7 deposit the same into an account at a financial institution within the state of Washington or with
8 the Court, and in either event no distribution from the same shall be made except as ordered by
9 this Court.

10 4. The posting of bond is hereby waived.

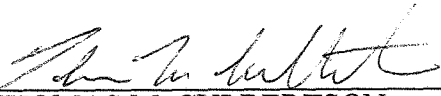
11
12 Dated: September 24, 2015.

13 MATTHEW FISCHER
14 Commissioner Pro-Tem

15 ~~JUDGE~~/COURT COMMISSIONER, *Pro Tem*

16 Presented by:

17 LUKINS & ANNIS, PS

18 By: 
19 THOMAS M. CULBERTSON
20 WSBA# 19787
21 Attorneys for Petitioner
22 717 W. Sprague Ave., Ste. 1600
23 Spokane, WA 99201
24 509 455-9555

25 By: 
26 NANCY J. PURCELL
(SCBA Legal Asst. Registration No. 66)