

Exhibit A

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GIBBONS P.C.

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

SULEIMAN ABDULLAH SALIM,
MOHAMED AHMED BEN SOUD,
OBAID ULLAH (as personal
Representative of GUL RAHMAN),

Plaintiffs,

vs.

JAMES ELMER MITCHELL and
JOHN "BRUCE" JESSEN,

Defendants.

No. 2:15-CV-286-JLQ

**PLAINTIFF SULEIMAN ABDULLAH
SALIM'S RESPONSES TO DEFENDANT
JESSEN'S REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiff Suleiman Abdullah Salim ("Plaintiff") hereby submits the following responses and objections to the Requests for Admission ("the Requests") served by Defendant John "Bruce" Jessen ("Defendant"). These responses are made within the limits of, and subject to, the general and specific objections set forth below.

Subject to and without waiving these objections, Plaintiff denies this request, because Defendants made decisions about how and when and upon whom to apply particular techniques.

REQUEST FOR ADMISSION NO. 4: Admit that neither Defendant participated in any of Your interrogations while You were in detention.

RESPONSE: Plaintiff objects to this Request on the ground that the term “participated” is ambiguous and undefined. Subject to and without waiving this objection, this request is admitted, with the qualification that Defendants designed and implemented the EIT Program that was applied to Plaintiff.

REQUEST FOR ADMISSION NO. 5: Admit that aside from the Defendants, You have not sought to hold anyone else liable for any potential injuries You may have suffered as a result of Your rendition, detention, or interrogation.

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO. 6: Admit that neither Defendant has been indicted, charged, or otherwise convicted with any crime in connection with Your rendition, detention, or interrogation.

RESPONSE: Plaintiff objects to this Request on the ground that it seeks an admission of matters that are irrelevant and outside the scope of Rule 26(b)(1). *See* Fed. R. Civ. P. 36(a)(1).

Subject to and without waiving this objection, this Request is admitted.

REQUEST FOR ADMISSION NO. 7: Admit that the CIA authorized all techniques utilized during any of Your interrogation(s).

CERTIFICATION OF SERVICE

I hereby certify that on February 13, 2017, I served the foregoing on the following individuals via email.

Brian S. Paszamant:
Paszamant@blankrome.com

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

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

Ariel S. Glasner
AGlasner@blankrome.com

Jeffrey Rosenthal
Rosenthal-J@blankrome.com

Christopher W. Tompkins:
Ctompkins@bpmlaw.com

Dated: February 13, 2017

s/ Lawrence S. Lustberg
Lawrence S. Lustberg, admitted *pro hac vice*
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JOHN "BRUCE" JESSEN,

Defendants.

No. 2:15-CV-286-JLQ

**PLAINTIFF MOHAMED AHMED BEN
SOUD'S RESPONSES TO DEFENDANT
JESSEN'S REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiff Mohamed Ahmed Ben Soud ("Plaintiff") hereby submits the following responses and objections to the Requests for Admission ("the Requests") served by Defendant John "Bruce" Jessen ("Defendant"). These responses are made within the limits of, and subject to, the general and specific objections set forth below.

Subject to and without waiving these objections, Plaintiff denies this request, because Defendants made decisions about how and when and upon whom to apply particular techniques.

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RESPONSE: Plaintiff objects to this Request on the ground that the term “participated” is ambiguous and undefined. Subject to and without waiving this objection, this request is admitted, with the qualification that Defendants designed and implemented the EIT Program that was applied to Plaintiff.

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RESPONSE: Admitted.

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Dated: February 13, 2017

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