

1 BETTS, PATTERSON & MINES, P.S.
2 Christopher W. Tompkins (WSBA #11686)
3 CTompkins@bpmlaw.com
4 701 Pike Street, Suite 1400
Seattle, WA 98101-3927

5 BLANK ROME LLP
6 Henry F. Schuelke III (admitted *pro hac vice*)
7 HSchuelke@blankrome.com
8 James T. Smith (admitted *pro hac vice*)
9 Smith-jt@blankrome.com
10 Brian S. Paszamant (admitted *pro hac vice*)
11 Paszamant@blankrome.com
12 Jeffrey N. Rosenthal (admitted *pro hac vice*)
13 Rosenthal-j@blankrome.com

14 Attorneys for Defendants

15 UNITED STATES DISTRICT COURT
16 FOR THE EASTERN DISTRICT OF WASHINGTON
17 AT SPOKANE

18 SULEIMAN ABDULLAH SALIM,
19 MOHAMED AHMED BEN SOUD,
20 OBAID ULLAH (as personal
representative of GUL RAHMAN),

21 Plaintiffs,

22 vs.

23 JAMES ELMER MITCHELL and
24 JOHN "BRUCE" JESSEN,

25 Defendants.

NO. 2:15-CV-286-JLQ

DECLARATION OF ADRIEN C.
PICKARD IN SUPPORT OF
DEFENDANTS' MOTION TO
EXCLUDE

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Betts
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Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1 I, Adrien C. Pickard, hereby certify under penalty of perjury, that the
2 following is true and correct and within my personal knowledge:

3 1. I am over the age of 18, have personal knowledge of all facts
4 contained in this declaration, and am competent to testify as a witness to those
5 facts.

6 2. I am one of the attorneys representing Defendants James Elmer
7 Mitchell and John “Bruce” Jessen (collectively, “Defendants”) in the above-
8 captioned action.

9 3. A true and accurate copy of portions of the Senate Select Committee
10 on Intelligence Study of the Central Intelligence Agency’s Detention and
11 Interrogation Program (the “Summary Report”) is attached hereto as **Exhibit A**.

12 4. A true and accurate copy of the Minority Views Report is attached
13 hereto as **Exhibit B**.

14 5. Attorneys for Defendants have reviewed the Summary Report, and
15 compared portions of it, including the evidence cited therein, to the existing record
16 in compiled in connection with this action. This examination revealed numerous
17 factual inaccuracies and misstatements within the Summary Report. The product
18 of this review is included in the Chart of Inaccuracies in Report, attached hereto as
19 **Exhibit C**.


20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the
21 laws of the United States that the foregoing is true and correct.
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DATED this 26th day of June, 2017.



Adrien C. Pickard

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of June, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Emily Chiang echiang@aclu-wa.org ACLU of Washington Foundation 901 Fifth Ave, Suite 630 Seattle, WA 98164	Paul Hoffman hoffpaul@aol.com Schonbrun Seplow Harris & Hoffman, LLP 723 Ocean Front Walk, Suite 100 Venice, CA 90291
Andrew I. Warden Andrew.Warden@usdoj.gov Senior Trial Counsel Timothy A. Johnson Timothy.Johnson4@usdoj.gov Trial Attorney United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave NW Washington, DC 20530	Steven M. Watt, admitted <i>pro hac vice</i> swatt@aclu.org Dror Ladin, admitted <i>pro hac vice</i> dladin@aclu.org Hina Shamsi, admitted <i>pro hac vice</i> hshamsi@aclu.org ACLU Foundation 125 Broad Street, 18th Floor New York, NY 10007
Avram D. Frey, admitted <i>pro hac vice</i> afrey@gibbonslaw.com Daniel J. McGrady, admitted <i>pro hac vice</i> dmcgrady@gibbonslaw.com Kate E. Janukowicz, admitted <i>pro hac vice</i> kjanukowicz@gibbonslaw.com Lawrence S. Lustberg, admitted <i>pro hac vice</i> llustberg@gibbonslaw.com Gibbons PC One Gateway Center Newark, NJ 07102	Anthony DiCaprio, admitted <i>pro hac vice</i> ad@humanrightslawyers.com Law Office of Anthony DiCaprio 64 Purchase Street Rye, NY 10580

By s/ Shane Kangas
Shane Kangas
skangas@bpmlaw.com
Betts, Patterson & Mines, P.S.

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