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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,  
22 OBAIDULLAH (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  
KATE JANUKOWICZ**

Without Argument

NOTE ON MOTION  
CALENDAR:  
August 18, 2017

1 I, Kate E. Janukowicz, 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' Motion to Exclude in  
7 Part the Testimony of Roger K. Pitman, M.D.  
8

9 2. On March 24, 2017, Defendants' counsel disclosed the expert reports  
10 of Dr. Roger K. Pitman to Plaintiffs.  
11

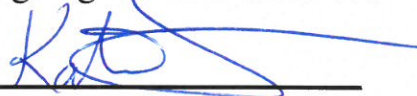
12 3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts  
13 from the expert report of Roger K. Pitman, M.D. as to Suleiman Abdullah  
14 Salim, dated March 24, 2017.  
15

16 4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts  
17 from the expert report of Roger K. Pitman, M.D. as to Mohamed Ahmed Ben  
18 Soud, dated March 24, 2017.  
19

20 5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts  
21 from the deposition transcript of Roger K. Pitman, M.D., dated April 27, 2017.  
22

23 \* \* \*

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

25   
\_\_\_\_\_  
Kate Janukowicz

26 Dated: July 14, 2017  
Newark, New Jersey

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of July, 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:

Andrew I. Warden <a href="mailto:andrew.warden@usdoj.gov">andrew.warden@usdoj.gov</a>	Timothy Andrew Johnson <a href="mailto:Timothy.johnson4@usdoj.gov">Timothy.johnson4@usdoj.gov</a>
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<i>Attorneys for Defendants</i>	

s/ Kate E. Janukowicz  
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