

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 1825 Eye St., N.W.  
Washington, DC 20006

9 James T. Smith (admitted *pro hac vice*)  
10 Smith-jt@blankrome.com

11 Brian S. Paszamant (admitted *pro hac vice*)  
12 Paszamant@blankrome.com

13 Jeffrey N. Rosenthal (admitted *pro hac vice*)  
14 Rosenthal-j@blankrome.com

15 One Logan Square, 130 N. 18th Street  
16 Philadelphia, PA 19103  
17 *Attorneys for Defendants Mitchell and Jessen*

18 **UNITED STATES DISTRICT COURT**  
19 **FOR THE EASTERN DISTRICT OF WASHINGTON**  
20 **AT SPOKANE**

21 SULEIMAN ABDULLAH SALIM,  
22 MOHAMED AHMED BEN SOUD,  
23 OBAID ULLAH (as personal  
24 representative of GUL RAHMAN),

25 Plaintiffs,

vs.

JAMES ELMER MITCHELL and  
JOHN "BRUCE" JESSEN,

Defendants.

NO. 2:15-CV-286-JLQ

DECLARATION OF ARIEL S.  
GLASNER IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION TO  
EXCLUDE IN PART THE  
TESTIMONY OF ROGER K.  
PITMAN, M.D.

DECLARATION OF A. GLASNER ISO  
OPPOSITION TO PLAINTIFFS' MOTION  
TO EXCLUDE RE THE TESTIMONY OF  
ROGER K. PITMAN, M.D. OPINIONS  
NO. 2:15-CV-286-JLQ

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

1 I, Ariel S. Glasner, 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

7 2. I am an attorney at the law firm of Blank Rome LLP, and am one of  
8 the attorneys representing Defendants James Elmer Mitchell and John "Bruce"  
9 Jessen (collectively, "Defendants") in the above-captioned action.

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of testimony  
11 excerpts taken from the deposition of Dr. Roger Pitman dated April 27, 2017.

12 4. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt  
13 of the Forensic Psychiatric Evaluation of Mohamed Ahmed Ben Soud prepared by  
14 Dr. Pitman and dated March 24, 2017.

15 5. Attached hereto as **Exhibit 3** is a true and correct copy of an excerpt  
16 of the Forensic Psychiatric Evaluation of Suleiman Abdullah Salim prepared by  
17 Dr. Pitman and dated March 24, 2017.  
18

19 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the  
20 laws of the United States that the foregoing is true and correct.

21 DATED this 28th day of July, 2017, at Washington, D.C.

22 

23 \_\_\_\_\_  
24 Ariel S. Glasner

1  
2  
3  
4  
5

## CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July, 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:

6 7 8	Emily Chiang <a href="mailto:echiang@aclu-wa.org">echiang@aclu-wa.org</a> ACLU of Washington Foundation 901 Fifth Ave, Suite 630 Seattle, WA 98164	Paul Hoffman <a href="mailto:hoffpaul@aol.com">hoffpaul@aol.com</a> Schonbrun Seplow Harris & Hoffman, LLP 723 Ocean Front Walk, Suite 100 Venice, CA 90291
9 10 11 12 13 14	Andrew I. Warden <a href="mailto:Andrew.Warden@usdoj.gov">Andrew.Warden@usdoj.gov</a> Senior Trial Counsel Timothy A. Johnson <a href="mailto:Timothy.Johnson4@usdoj.gov">Timothy.Johnson4@usdoj.gov</a> 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> <a href="mailto:swatt@aclu.org">swatt@aclu.org</a> Dror Ladin, admitted <i>pro hac vice</i> <a href="mailto:dladin@aclu.org">dladin@aclu.org</a> Hina Shamsi, admitted <i>pro hac vice</i> <a href="mailto:hshamsi@aclu.org">hshamsi@aclu.org</a> ACLU Foundation 125 Broad Street, 18th Floor New York, NY 10007
15 16 17 18 19 20 21	Avram D. Frey, admitted <i>pro hac vice</i> <a href="mailto:afrey@gibbonslaw.com">afrey@gibbonslaw.com</a> Daniel J. McGrady, admitted <i>pro hac vice</i> <a href="mailto:dmcgrady@gibbonslaw.com">dmcgrady@gibbonslaw.com</a> Kate E. Janukowicz, admitted <i>pro hac vice</i> <a href="mailto:kjanukowicz@gibbonslaw.com">kjanukowicz@gibbonslaw.com</a> Lawrence S. Lustberg, admitted <i>pro hac vice</i> <a href="mailto:llustberg@gibbonslaw.com">llustberg@gibbonslaw.com</a> Gibbons PC One Gateway Center Newark, NJ 07102	Anthony DiCaprio, admitted <i>pro hac vice</i> <a href="mailto:ad@humanrightslawyers.com">ad@humanrightslawyers.com</a> Law Office of Anthony DiCaprio 64 Purchase Street Rye, NY 10580  Jeffrey K. Finer <a href="mailto:jeffry@finerwinn.com">jeffry@finerwinn.com</a> Center for Justice 35 W Main, Suite 300 Spokane, WA 99201

22  
23  
24  
25

By           s/ Karen Langridge          

Karen Langridge

[klangridge@bpmlaw.com](mailto:klangridge@bpmlaw.com)

Betts, Patterson & Mines, P.S.

DECLARATION OF A. GLASNER ISO  
OPPOSITION TO PLAINTIFFS' MOTION  
TO EXCLUDE RE THE TESTIMONY OF  
ROGER K. PITMAN, M.D. OPINIONS  
NO. 2:15-CV-286-JLQ

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