

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
Philadelphia, PA 19103
Attorneys for Defendants Mitchell and Jessen

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

19 SULEIMAN ABDULLAH SALIM, et
20 al.

21 Plaintiffs,

22 v.

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

25 Defendants.

NO. 2:15-CV-286-JLQ

DECLARATION OF
JEFFREY N. ROSENTHAL IN
SUPPORT OF DEFENDANTS'
RESPONSE IN OPPOSITION TO
PLAINTIFFS' MOTIONS *IN LIMINE*

DECLARATION OF JEFFREY N.
ROSENTHAL IN SUPPORT OF
DEFENDANTS' RESPONSE IN
OPPOSITION TO PLAINTIFFS'
MOTIONS *IN LIMINE*
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, Jeffrey N. Rosenthal, 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 in the above-captioned action.

10 3. On August 9-10, 2017, counsel for the parties engaged in an email
11 exchange regarding the present scope of information designated by Plaintiffs as
12 confidential, and specifically, the confidential nature of certain portions of the
13 deposition testimony of Plaintiff Suleiman Abdullah Salim. Plaintiffs’ counsel did
14 not agree to waive the confidential designation of such deposition testimony.
15

16 4. Attached hereto as **Exhibit A** are true and correct copies of testimony
17 excerpts from the deposition of Plaintiff Mohamed Ahmed Ben Soud, which was
18 taken on January 31, 2017.

19 5. Attached hereto as **Exhibit B** are true and correct copies of testimony
20 excerpts from the deposition of Plaintiff Suleiman Abdullah Salim, which was
21 taken on March 14, 2017.


22 6. Attached hereto as **Exhibit C** are true and correct copies of testimony
23 excerpts from the deposition of Plaintiff Obaid Ullah (as personal representative of
24 Gul Rahman), which was taken on January 31, 2017.
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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the
2 laws of the United States that the foregoing is true and correct.
3

4 DATED this 10th day of August, 2017, at Philadelphia, Pennsylvania.
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7 _____
8 Jeffrey N. Rosenthal
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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of August, 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/Karen Pritchard
Karen Pritchard
kpritchard@bpmlaw.com
Betts, Patterson & Mines, P.S.

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