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8 Attorneys for Defendants LAW OFFICES OF ORLY TAITZ and DR. ORLY TAITZ,
9 ESQ., D.D.S., J.D.

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

12 CHARLES EDWARD LINCOLN, III,
13 Plaintiff,

14 Vs.

15 DAYLIGHT CHEMICAL
16 INFORMATION SYSTEMS,
17 INCORPORATED, YOSEF TAITZ,
18 ORALY TAITZ, INC., APPEALING
19 DENTISTRY, LAW OFFICE OF ORAL
20 TAITZ (RICO Enterprise), DR. ORLY
TAITZ, ESQ., D.D.S., J.D., DEFEND
OUR FREEDOMS FOUNDATION, and
all JOHN & JANE DOES 1-10,

21 Defendants.

No. 8:10-cv-01573-AG-PLA
DEFENDANTS LAW OFFICES OF
ORLY TAITZ AND DR. ORLY TAITZ,
ESQ., D.D.S., J.D.'S INITIAL
DISCLOSURES

Complaint Filed: 10/15/2010

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23 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

24 Pursuant to Federal Rule of Civil Procedure ("FRCP") 26(a)(1)(A), defendants
25 LAW OFFICES OF ORLY TAITZ and DR. ORLY TAITZ, ESQ., D.D.S., J.D.
26 (collectively hereinafter "Defendants") hereby submit the following Initial
27 Disclosures. These disclosures are preliminary and made in advance of discovery. As
28 Defendants continue their investigation of the facts and issues of this case, Defendants

1 expressly reserve the right to amend these disclosures as may be warranted. Further, it
2 should be noted that the instant Initial Disclosures are made in the absence of an
3 operative complaint, as plaintiff failed to file a Second Amended Complaint. With
4 that in mind, Defendants intend to file a motion to dismiss this action based on lack of
5 subject matter jurisdiction and plaintiff's failure to comply with a Court Order.

6 Subject to and without waiving the foregoing objections, Defendants make the
7 following initial disclosures:

8 **I. WITNESSES SUPPORTING DEFENDANTS' CLAIMS AND/OR**
9 **DEFENSES**

10 Dr. Orly Taitz, Esq., D.D.S., J.D.

11 Defendants are presently unaware of any other supporting witnesses. However,
12 discovery and investigation are ongoing.

13 **II. NON-PRIVILEGED DOCUMENTS SUPPORTING**
14 **DEFENDANTS' CLAIMS AND/OR DEFENSES**

- 15 A. Various email correspondence between Defendants and plaintiff.
- 16 B. Various correspondence between Defendants and plaintiff.
- 17 C. Cancelled checks.
- 18 D. Phone messages left by plaintiff.

19 Defendants are presently unaware of any other supporting documents.
20 However, discovery and investigation are ongoing.

21 **III. DAMAGES**

22 Defendants are not making any claims for damages.

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IV. DEFENDANTS' LIABILITY INSURANCE

Defendants' liability insurance policy will be made available upon request for inspection and copying, pursuant to FRCP 26(a)(1)(A)(iv).

Dated: March 22, 2011

FORD, WALKER, HAGGERTY & BEHAR

BY: 
WILLIAM C. HAGGERTY
KATHERINE M. HARWOOD
Attorneys for Defendants,
LAW OFFICES OF ORLY TAITZ and
DR. ORLY TAITZ, ESQ., D.D.S., J.D.

(PROOF OF SERVICE BY ELECTRONIC MAIL – F.R.Civ.P. 5)
Lincoln v. Daylight Chemical Information Systems, et al.
Case No: 8:10-cv-01573-AG-PLA

1 UNITED STATES DISTRICT COURT }
2 }
3 CENTRAL DISTRICT OF CALIFORINA }

4 I am employed in the aforesaid county; I am over the age of eighteen years and not a
5 party to the within entitled action; my business address is: One World Trade Center, Twenty-
6 Seventh Floor, Long Beach, California 90831-2700
7

8 On March 22, 2011, I served the within: DEFENDANTS LAW OFFICES OF ORLY
9 TAITZ AND DR. ORLY TAITZ, ESQ., D.D.S., J.D.'S INITIAL DISCLOSURES on the
interested parties in said action,

10 x Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court
11 using the CM/ECF system, which sent notification of that filing to the persons listed below:

12 SEE ATTACHED MAILING LIST

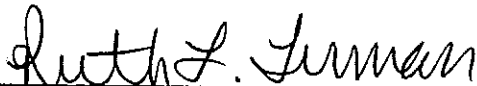
13 by depositing it in the United States Mail at Long Beach, California, in a sealed envelope
with the postage fully prepaid to the following;

14 I hereby certify that I am a member of the Bar of the United States District Court, Central
15 District of California.

16 x I hereby certify that I am employed in the office of a member of the Bar of this Court at
whose direction the service was made.

17 x I hereby certify under the penalty of perjury that the foregoing is true and correct.
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19 Executed on March 22, 2011, at Long Beach, California.

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Ruth L. Terman
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2	Charles Edward Lincoln, III 603 Elmwood Place Suite 6 Austin, TX 78705	<u>Charles.lincoln@rocketmail.com</u> 512/968-2500	Plaintiff in Pro Per
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4	Mark Melo Bradley and Gmelich 700 North Brand Boulevard 10 th Floor Glendale, California 91203-1202	<u>Mmelo@bglawyers.com</u> 818/2430-5200 818/243-5266 (facsimile)	Attorneys for Defendants Daylight Chemical Information Systems Incorporated and Yosef Taitz
5			
6	Orly Taitz Orly Taitz Law Offices 26302 La Paz , Suite 211 Mission Viejo, California 92691	<u>Dr_taitz@yahoo.com</u> 949/683-5411	Attorneys for Defendants Appealing Dentistry Defend Our Freedoms Foundation, Orly Taitz, Inc., and Law Offices of Orly Taitz
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8	Gary G. Kreep Law Offices of Gary G. Kreep 932 D Street, Suite 2 Ramona, California 92065	<u>Usjf@usjf.net</u> 760/788-6624 760-788-6414 (facsimile)	Attorneys for Plaintiff Charles Edward Lincoln, III
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10	Philip J. Berg Law Offices of Philip J. Berg 555 Andorra Glen Court Suite 12 Lafayette Hill, PA 19444-2531	<u>Philjberg@gmail.com</u> 610/825-3134 (telephone) 610/834-7659 (facsimile)	Pro Hac Vice Attorneys for Plaintiff Charles Edward Lincoln, III
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12	William Edward Pallares Lewis Brisbois Bisgaard and Smith LLP 221 North Figueroa Street, 12 th Floor Los Angeles, California 90012-2601	<u>Pallares@lbbslaw.com</u> 213/250-1800 213/250-7900 (facsimile)	Attorneys for Defendants Law Offices of Orly Taitz and Dr. Orly Taitz
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