

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

LARRY KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH

Defendant.

Case No: 1:13-cv-20610-CMA

**DEFENDANT’S NOTICE OF FILING OBJECTIONS TO PLAINTIFF’S PRE-TRIAL
DISCLOSURE OF EXHIBITS AND WITNESSES**

Defendant Judicial Watch, Inc. states the following objections to Plaintiff’s Pre-Trial Disclosure of Exhibits and Witnesses first served on May 6, 2014 and supplemented through May 13, 2014.

Legend for Objections

A–Authenticity

I–Contains inadmissible matter (mentions insurance, prior conviction, etc.)

R–Relevancy

H–Hearsay

UP–Unduly prejudicial-probative value outweighed by undue prejudice

P–Privileged

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS	Objection
1					“My Yesterday’s Presentation to CCIR and Update on Article2SuperPac-Larry Klayman \$25,000 Fundraising for Non-Existent Law Suit Affair” Posted on February 23, 2012 with Comments	A, H
2					“Clarification Regarding Article2Legal Fund and Larry Klayman” Posted February 26, 2012 with Comments	A, H

3					Series of Emails From/To Larry Klayman To/From Judicial Watch's Counsel, Richard Driscoll, Seeking to Rectify the Defamatory Statements and Driscoll's Response	UP
4					"An Open Letter to Orly Taitz; Re: Defamatory Statements" By Captain Pamela Barnett and George Miller	A, H
5					"When a Paper Terrorist Meets a Paper Terrorist" of February 23, 2012	A, H
6					Free Republic Email Correspondence	A, H, R
7					UROC Cover, Emails from Constance Ruffley to Tom Fitton, Paul Orfanedes, Chris Farrell	None
8					Free Republic Email Correspondence	A, H, R
9					"Article 2superpac was Raising \$25,000 for Larry Klayman. Did Anyone see any Obama election challenge law suits filed in courts by attorney Larry Klayman?" – provided recently by George Miller	None
10					"Update on Article2superpac" posted on February 25, 2012 – provided recently by George Miller	None
11					"Update on article2legal Defense Fund" posted on February 27, 2012 – provided recently by George Miller	None
12					"Reminder: tomorrow's hearing before the Elections committee in IN is moved to the third floor, House of Representatives chamber due to a large number of people attending" posted on	A, H, R

					February 23, 2012 – provided recently by George Miller	
13					“the defense is not yet in discovery” posted April 18, 2012 – provided recently by George Miller	None
14					“An Open Letter to a reader, answers regarding [sic] Larry Klayman [sic], WND and ORYR” posted April 23, 2012 – provided recently by George Miller	None
15					Email Correspondence between Constance Ruffley and Tom Fitton, Paul Orfanedes and Chris Farrell and others regarding Larry Klayman	None
16					Email Correspondence between Constance Ruffley and Others regarding Larry Klayman	None
17					Letter From Isabelle Klayman to her Father, Larry Klayman	A, H, R, UP
18					Letter From Isabelle Klayman to Her then Stepmother, Diana Klayman	A, H, R, UP
19					Picture Drawn by Isabelle Klayman for her Father, Larry Klayman	A, H, R, UP
20					Father’s Day Card from Isabelle Klayman to Her Father, Larry Klayman	A, H, R, UP
21					Christmas Card with Larry Klayman and Children	A, H, R, UP
22					Envelope from Isabelle Klayman to her Father Larry Klayman	A, H, R, UP
23					Family Photos of Larry Klayman, Diana Klayman and Children	A, H, R, UP
24					Family Photos of Larry Klayman, Diana Klayman and Children	A, H, R, UP
25					Family Photos of Larry Klayman and Children	A, H, R, UP

26					Family Photos of Larry Klayman and Children	A, H, R, UP
27					Family Photos of Larry Klayman and Isabelle Klayman	A, H, R, UP
28					Family Photos of Larry Klayman and Isabelle Klayman	A, H, R, UP
29					Family Photos of Larry Klayman and Children	A, H, R, UP
30					Family Photos of Larry Klayman and Children	A, H, R, UP
31					Family Photos of Larry Klayman and Children	A, H, R, UP
32					Family Photos of Larry Klayman and Children	A, H, R, UP
33					Family Photos of Larry Klayman and Children	A, H, R, UP
34					Family Photos of Larry Klayman and Children	A, H, R, UP
35					Family Photos of Larry Klayman and Children	A, H, R, UP
36					Family Photos of Larry Klayman and Children	A, H, R, UP
37					Family Photos of Larry Klayman and Children	A, H, R, UP
38					Family Photos of Larry Klayman and Children	A, H, R, UP
39					Family Photos of Larry Klayman and Isabelle Klayman	A, H, R, UP
40					Family Photos Klayman Children	A, H, R, UP
41					Family Photos Isabelle Klayman	A, H, R, UP
42					Family Photos of Lance Klayman	A, H, R, UP
43					Billing Statement from Klayman Law Firm dated July 23, 2012	This is the subject of Defendant's Motion in Limine
44					Email Correspondence between George Miller and Larry Klayman – Payment	None
45					Email Correspondence between George Miller and Larry Klayman – Voeltz v. Obama et al – Florida Ballot Challenge	None
46					Email Correspondence between George Miller and Larry Klayman – Retention Agreement	None

					with Klayman Law Firm	
47					Email from George Miller to “esteemed donors” – Voeltz v. Obama –Florida Ballot Challenge Hearing – thank you and more ...	A, H, R, UP
48					Email Correspondence between Larry Klayman and Orly Taitz February 26, 2012 – Defamation, False Light, Invasion of Privacy, False Advertising and Other Torts	None
49					Email from George Miller to Larry Klayman from February 26, 2012	A, H, UP
50					Email from Larry Klayman to Orly Taitz – Defamation, False Light, Invasion of Privacy, False Advertising, Tortious Interference with Business Relations and Other Causes of Action, dated February 24, 2012	None
51					Larry Klayman’s Biography	None
52					Red County – Larry Klayman – The One Man Tea Party dated July 31, 2010	A, H, R, UP
53					Larry Klayman, My Hero by Joseph Farah dated November 3, 1999	A, H, R, UP
54					Thank God for Larry Klayman by Joseph Farah dated November 25, 1998	A, H, R, UP
55					Larry Klayman for U.S. Senate by Joseph Farah dated August 26, 2004	A, H, R, UP
56					National Journal dated June 29, 2002	A, H, R, UP
57					NSA Ruling Marks Larry Klayman’s Biggest Legal Success by Devlin Barrett dated December 17, 2013	A, H, R, UP
58					Meet Larry Klayman: Man Behind the NSA	A, H, R, UP

					Lawsuit by Alex Lazar dated December 19, 2013	
59					Score One for Thorn Government's Side Behind N.S.A. Ruling by Michael Shear dated December 17, 2013	A, H, R, UP
60					El Mundo – El Gobierno de EEUU recurre el dictamen contra el programma de espionaje de la NSA dated March 1, 2014	A, H, R, UP
61					Lawsuit to Accuse Castro – Russia Channel Discussion Forum	A, H, R, UP
62					EEUU. – Supremo rechaza tramitar una denuncia sobre espionaje de la NSA dated April 7, 2014	A, H, R, UP
63					Los Angeles Times – Judicial Watch Keeps Eye on Clinton dated April 20, 1998	A, H, R, UP
64					The BLT: The Blog of Legal Times – Larry Klayman: Socialist Slayer dated December 8, 2008	A, H, R, UP
65					Washington Times – Inside the Beltway: Larry Klayman's spiritual calling dated December 18, 2013	A, H, R, UP
66					U.S. News & World Report dated January 20, 2003	A, H, R, UP
67					Washington Post – Body Suit dated June 12, 2006	A, H, R, UP
68					Power Blog – Klayman & Keyes ask Jeb Bush to "Pardon" Schiavo	A, H, R, UP
69					CNN.com transcript – Larry King Live – Should President Clinton Be Disbarred?	A, H, R, UP
70					Florida Court Opens Trial on Shootdown of Exiled Cuban Planes – 2003-02-26	A, H, R, UP
71					Law of the Land – Castro on Trial for U.S.	A, H, R, UP

					terrorism – Court considers damages for '96 shoot-down by Cuban MiGs dated February 27, 2003	
72					News – Cubans file war crime suit against Castro dated October 5, 2001	A, H, R, UP
73					CUBANEWS – Shootdown survivor's lawyer: Castro rivals Hussein as a threat dated February 27, 2003	A, H, R, UP
74					South Florida Sun-Sentinel – Brothers to the Rescue's case against Castro plays out in court dated February 27, 2003	A, H, R, UP
75					Schiavo Protestors' Passions Rise dated March 27, 2005	A, H, R, UP
76					Gonzalez v. Reno INS United States Court of Appeals, Eleventh Circuit	A, H, R, UP
77					ONG estadounidense demanda al presidente Hugo Chavez dated April 16, 2009	A, H, R, UP
78					Chavez cierra todos los espacios y busca control dated May 17, 2009	A, H, R, UP
79					Amazon.com – Whores: Why and How I Came to Fight the Establishment	A, H, R, UP
80					PBS, the fixers: Larry Klayman	A, H, R, UP
81					E la Montreal – 17 Years After Custodial Kidnapping, Son Hopes to See Mom Again dated March 18, 2013	A, H, R, UP
82					Jacksonville.com – Parents say DCF harassed them as their child was dying of cancer dated November 10, 2005	A, H, R, UP
83					St. Petersburg Times – Watchdogs do their own recount in Palm Beach dated November 29,	A, H, R, UP

					2000	
84					Front and Back Copy of the book "Whores: Why and How I Came to Fight the Establishment by Larry Klayman	R, UP
85					"Avoid False Accusations of Child Sexual Abuse"	A, H, R, UP
86					"The Nuclear Option: False Child Sexual Abuse Allegations in Custody Disputes" dated February 18, 2008	A, H, R, UP
87					"Corruption Chronicles" by Tom Fitton	R
88					Leon County Clerk of Courts Civil Docket Sheet 000467	A, H, R, UP
89					Leon County Clerk of Courts Civil Docket Sheet 002063	A, H, R, UP
90					Leon County Clerk of Courts Civil Docket Sheet 003857	A, H, R, UP
91					First District Court of Appeal 13-0083	A, H, R, UP
92					First District Court of Appeal 12-3489	A, H, R, UP
93					Florida Supreme Court Docket SC13-560	A, H, R, UP
94					National Journal dated June 29, 2002 – Contents: "Turning the Tables" by Louis Jacobson	A, H, R, UP
95					Memorandum Opinion No. 06-670 January 17, 2007 Kotelly	None
96					Memorandum Opinion No. 06-670 April 3, 2007 Kotelly	None
97					Deposition of Tom Fitton, January 31, 2014	H, R, UP
98					Deposition of Paul Orfanedes, January 29, 2014	H, R, UP
99					Deposition of Chris Farrell, January 29, 2014	H, R, UP
100					Deposition of Constance Ruffley	H, R, UP
101					Second Amended Complaint Filed 6/14/06 Klayman, <i>Benson v.</i>	A, H, R, UP

					<i>Judicial Watch</i>	
102					Capias Recalled on 4/20/2012	None
103					Washington Post Feature, "Can Larry Klayman Make History With His NSA Lawsuit" May 11, 2014	A, H, R, UP
104					Orly Taitz Affidavit 1 of March 26, 2014	A, H, R, UP
105					Orly Taitz Affidavit 2 of March 20, 2014	A, H, R, UP
106					Polygraph Determination dated October 15, 2007 administered by James L. Wilt	A, H, R, UP
107					Children and Family Services Commissions Letter dated May 2, 2008	A, H, R, UP
108					Letter from Assistant Prosecuting Attorney David Zimmerman dated September 17, 2008	A, H, R, UP
109					United States District & Bankruptcy Courts, Good Standing Certificate May 1, 2014	A, H, R, UP
110					Certificate of Disciplinary History Pennsylvania dated July 30, 2013, Renee Weber	A, H, R, UP
111					District of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013	A, H, R, UP
112					The Florida Bar, Good Standing dated March 20, 2013 by Johnny Smith	A, H, R, UP
113					Severance Agreement dated September 19, 2003	A, H, R, UP, P
114					Letter, Breach of Contract dated April 26, 2004	A, H, R, UP, P
115					C-SPAN letter dated April 27, 2007	A, H, R, UP, P
116					December 12, 2004 Letter to Mr. Barmak and Ms. Jarquin	A, H, R, UP, P
117					Email Correspondence between Tom Fitton and	A, H, R, UP, P

					Larry Klayman dated April 26, 2004	
118					Media Advisory dated September 23, 2003	A, H, R, UP, P
119					Certificate of Good Standing for Southern District of Florida	A, H, R, UP

PLAINTIFF'S WITNESS LIST

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	WITNESS LIST	Objection
1					Orly Taitz, 29839 Santa Margarita Parkway, Suite 100, Rancho Santa Margarita CA 92688	
2					Constance Ruffley, 2549 Huntington Drive, Suite 201, San Marino CA 91108	
2					Larry Klayman, 2520 Coral Way, Suite 2027, Miami, FL 33145	
3					Tom Fitton, 425 Third Street SW, Suite 800, Washington, DC 20024	
4					Paul Orfanedes, 425 Third Street SW, Suite 800, Washington, DC 20024	
5					Christopher Farrell, 425 Third Street SW, Suite 800, Washington, DC 20024	
6					Sandra Cobas	R, UP¹
7					Jose Basulto	R, UP
8					George Miller	R, UP
9					Sam Naples	R, UP

¹ For each objection to witnesses based on UP (Unfair Prejudice), Defendant states that the witnesses were not timely identified. Even with the disclosure served on May 6, 2014, Plaintiff did not identify contact information (addresses, telephone number, or email addresses) for the various alleged witnesses.

10					Donato Dalrymple	R, UP
11					Naveed Mahboobian	R, UP
12					Tom Madden	R, UP
13					Adrienne Madden	R, UP
14					Pino Cignarella	R, UP
15					Louise Benson	R, UP
16					Michael Voeltz	R, UP
17					Willy Chirino	R, UP
18					Lisette Chirino	R, UP
19					Bob Barr	R, UP
20					Helen Aguirre	R, UP
21					Moryns Lewitzky	R, UP
22					Ursula Ungaro	R, UP
23					Michelle Koskinski	R, UP
24					Oscar Garcia	R, UP
25					Marici	R, UP
26					Michael Schiavo	R, UP
27					Pastor Dan Johnson	R, UP

Dated: **May 13, 2014**

Respectfully submitted,

SCHWED KAHLE & KRESS, P.A.
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 Palm Beach Gardens, FL 33418
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 Facsimile: (561) 694-0057

/s/ Douglas J. Kress
 Douglas J. Kress, Esq.
 Florida Bar No.: 0061146
 Email: dkress@schwedpa.com
Attorneys for Defendant Judicial Watch, Inc.

Certificate of Service

I hereby certify that on **May 13, 2014**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Douglas J. Kress
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SERVICE LIST

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VIA CM/ECF