ANAO 187 (Rev. 7/87) Exhibit and Witness List

# UNITED STATES DISTRICT COURT

Southern

V. Judicial Watch, Inc. DISTRICT OF

Florida

#### Klayman

EXHIBIT AND WITNESS LIST

Case Number: 1:13-cv-20610-CMA

PRESIDING JUDGE The Honorable Cecilia M. Altonaga					PLAINTIFF'S ATTORNEY Larry Klayman, Esq.	DEFENDANT'S ATTORNEY Douglas Krøss, Esq.		
TRIAL DATE (S) 5/19/2014-6/2/2014					COURT REPORTER	COURTROOM DEPUTY		
PLF. NO.	1 ENANDER DA DATTERT				DESCRIPTION OF EXI	IIBITS* AND WITNESSES		
1					Feb. 23, 2012 posting "My yesterday's presentati	on to CCIR and update on Article2SuperPac"		
2					Feb. 26, 2012 posting "Clarification Regarding Ar	ticle2t.egal Fund and Larry Klayman"		
3					Series of Emails From/To Larry Klayman To/From	Judicial Watch's Counsel, Richard Driscoll		
4					"An Open Letter to Orly Taitz; Re: Defamatory Sta	alements" by George Miller and Pamela Barnett		
5	5				"When a Paper Terrorist Meets a Paper Terrorist"	of Feb. 23, 2012		
6	6				Free Republic Email Correspondence	······································		
7					UROC Cover, Emails from Constance Rutfley to	UROC Cover, Emails from Constance Rutfley to Tom Fitton, Paul Orfanedes, Chris Farrell		
8					Free Republic Email Correspondence			
9					"Article 2superpac was raising \$25,000 for Larry Klayman" recently provided by George Miller			
10					"Update on Article2superpac" posted on Feb. 25, 2012 recently provided by George Miller			
11					"Update on article2legal Defense Fund" posted Feb. 27, 2012 recently provided by George Miller			
12					"Reminder: tomorrow's hearing" posted Feb. 23	3, 2012 provided recently by George Miller		
13					"the defense is not yet in discovery" posted April	18, 2012 – provided recently by George Miller		
14					"An Open Letter to a reader" posted April 23, 20	012 - provided recently by George Miller		
15					Email between Constance Ruffley, Tom Fitton, Pa	aul Orfanedes and Chris Farrell and others		
16					Email Correspondence between Constance Ruffl	ey and Others regarding Larry Klayman		
17					Letter From Isabelle Klayman to her Father, Larry	/ Klayman		
18					Letter From Isabelle Klayman to Her then Stepmo	other, Diana Klayman		
19					Picture Drawn by Isabelle Klayman for her Father	r, Larry Klayman		
20					Father's Day Card from Isabelle Klayman to Hor I	Father, Larry Klayman		
21					Father's Day Card from Isabelle Klayman to Her I	Father, Larry Klayman		
22					Envelope from Isabelle Klayman to her Father La	rry Klayman		

\* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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### **EXHIBIT AND WITNESS LIST – CONTINUATION**

		Klaymar	1	v	Judicial Watch, Inc. 113-6v-20610-CMA		
PLF. NO,	DEF. NO,	DATE OFFERED	MARKED	ADMITTED.	DESCRIPTION OF EXHIBITS AND WITNESSES		
23					Family Photos of Larry Klayman, Dlana Klayman and Children		
24					Family Photos of Larry Klayman, Diana Klayman a	and Children	
25					Family Photos of Larry Klayman and Children		
26					Family Photos of Larry Klayman and Children		
27					Family Photos of Larry Klayman and Isabelle Klay	ุฑลก	
28					Family Photos of Larry Klayman and Isabelle Klay	man	
29					Family Photos of Larry Klayman and Children		
30					Family Photos of Larry Klayman and Children		
31					Family Photos of Larry Klayman and Children		
32					Family Photos of Larry Klayman and Children		
33					Family Photos of Larry Klayman and Children		
34					Family Photos of Larry Klayman and Children		
35					Family Photos of Larry Klayman and Children		
36					Family Photos of Larry Klayman and Children		
37					Family Photos of Larry Klayman and Children		
38					Family Photos of Larry Klayman and Children		
39					Family Photos of Larry Klayman and Isabelle Klayman		
40					Family Photos of Klayman Children		
41					Family Photos of Isabelle Klayman		
42					Family Photos of Lance Klayman		
43					Billing Statement from Klayman Law Firm dated July 23, 2012		
44					Email Correspondence between George Miller and	d Larry Klayman – Payment, June 4, 2012	
45					Emails between George Miller and Klayman, Voel	z v. Obama et al, Bałłot Challenge May 7, 2012	
46					Emails between Georgo Miller and Larry Klayman	- Retention Agreement with Klayman, Feb. 8, 201	
47					Email from George Miller to "esteemed donors"	thank you and more June 7, 2012	
48					Emails between Klayman and Taitz Feb. 26, 2012, Defamation, False Light, Invasion of Privacy		
49					Email from George Miller to Larry Klayman from F	ebruary 26, 2012	

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### **EXHIBIT AND WITNESS LIST – CONTINUATION**

		Klaymar	1	v	s. Judicial Watch, Inc.		
ч.F. NO,	DEF. NO,	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES		
50					Email from Larry Klayman to Orly Taitz Defamation, False Light dated Feb. 24, 2012		
51					Larry Klayman's Biography		
52					Red County ~ "Larry Klayman – The One Man Tea Party" dated July 31, 2010		
53					"Larry Klayman, My Hero" by Joseph Farah dated November 3, 1999		
54					'Thank God for Larry Klayman' by Joseph Farah dated November 25, 1998		
55					"Larry Klayman for U.S. Senate" by Joseph Farah dated August 26, 2004		
56					National Journal dated June 29, 2002		
57					"NSA Ruling Marks Larry Klayman's Biggest Legal Success" by Dovlin Barrett, Dec. 17, 2013		
58					'Meet Larry Klayman: Man Behind the NSA Lawsuit" by Alex Lazar dated Dec. 19, 2013		
59					"Score One for Thorn Government's Side Behind N.S.A. Ruling" by Michael Shear Dec. 17, 2013		
60					"El Gobierno de EEUU recurre el dictamen contra el programma " March 1, 2014		
61					Lawsuit to Accuse Castro – Russia Channel Discussion Forum, October 4, 2001		
62					EEUU. – 'Supremo rechaza tramitar una denuncia sobre espionaje de la NSA" April 7, 2014		
63					Los Angeles Times – "Judicial Watch Keeps Eye on Clinton" April 20, 1998		
64					The BLT: The Blog of Legal Times – "Larry Klayman: Socialist Slayer" Dec. 8, 2008		
65					Washington Times – "Inside the Beltway: Larry Klayman's spiritual calling" Dec. 18, 2013		
66					U.S. News & World Report, January 20, 2003		
67					Washington Post - "Body Suit" June 12, 2006		
68					Power Blog – "Klayman & Keyes ask Jeb Bush to 'Pardon' Schiavo"		
69					CNN.com transcript – Larry King Live – "Should President Clinton Be Disbarred?" May 23, 2000		
70					"Florida Court Opens Trial оп Shootdown of Exiled Cuban Planes" Feb. 26, 2003		
71					"Castro on Trial for U.S. terrorism" Feb. 27, 2003		
72					News – "Cubans file war crime suit against Castro". October 5, 2001		
73					CUBANEWS – Shootdown survivor's lawyer: Castro rivals Hussein as a threat Feb. 27, 2003		
74					South Florida Sun-Sentinel - "Brothers to the Rescue's case against Castro" Feb. 27, 2003		
75					"Schiavo Protestors' Passions Rise" March 27, 2005		
76					Gonzalez v. Rono INS United States Court of Appeals, Eleventh Circuit		

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### **EXHIBIT AND WITNESS LIST – CONTINUATION**

		Klayman		V!	s. Judicial Watch, Inc. 1:13-80-20610-CMA		
PLF. NO,				ADMUTTED	DESCRIPTION OF EXHIBITS AND WITNESSES		
77					"ONG estadounidense demanda al presidente Hugo Chavez" April 16, 2009		
78					"Chavez cierra todos los espacios y busca control	" May 17, 2009	
79					Amazon.com Whores: Why and How I Came to	Fight the Establishment	
80	,				PBS, the fixers: Larry Klayman		
81					"17 Years After Custodial Kidnapping, Son Hopes	to See Mom Again" March 18, 2013	
82					"Parents say DCF harassed them as their child we	as dying of cancer" Nov. 10, 2005	
83					St. Petersburg Times Watchdogs do their own re	ecount in Palm Beach dated Nov. 29, 2000	
84					Front and Back Copy of the book "Whores" by Lar	ry Klayman	
85					"Avoid False Accusations of Child Sexual Abuse"		
86					"The Nuclear Option: False Child Sexual Abuse Al	legations in Custody Disputes" Feb. 18, 2008	
87					"Corruption Chronicles" by Tom Fitton		
88					Leon County Clerk of Courts Civil Docket Sheet 000467		
89					Leon County Clerk of Courts Civil Docket Sheet 002063		
90					Leon County Clerk of Courts Civil Docket Sheet 003857		
91					First District Court of Appeal 13-0083		
92					First District Court of Appeal 12-3489		
93					Florida Supreme Court Docket SC13-560		
94					National Journal dated June 29, 2002 - Contents: "Turning the Tables" by Louis Jacobson		
95					Memorandum Opinion No. 06-670 January 17, 2007		
96					Memorandum Opinion No. 06-670 April 3, 2007		
97					Deposition of Torn Fitton		
98					Deposition of Paul Orfanedes		
99					Deposition of Christopher Farrell		
100					Deposition of Constance Ruffley		
101					Second Amended Complaint Filed 6/14/06 Klayman, Benson v. Judicial Watch, Inc.		
102					Capias Recalled April 20, 2012		
103				· · · · · · · · · · · · · · · · · · ·	The Washington Post, "Can Larry Klayman Make	History With His NSA Lawsuit" May 11, 2014	

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#### **EXHIBIT AND WITNESS LIST -- CONTINUATION**

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10511110510rly Taitz Affidavit dated March 20, 20141061Polygraph Determination dated October 15, 2007 administered by James L. Wilt107111081Children and Family Services Commissions Letter dated May 2, 2008108111091Letter from Assistant Prosecuting Attorney David ZImmerman dated September 17, 2001091United States District & Bankruptcy Courts, Good Standing Certificate May 1, 201411011Certificate of Disciplinary History Pennsylvania dated July 30, 2013, Renee Weber11111District of Columbia Court of Appeals, Good Standing Certificate dated March 20, 201311211Severance Agreement dated September 19, 200311411Certificate dated April 26, 200411511December 12, 2004 Letter to Mr. Barmak and Ms. Jarquin11711Email Correspondence between Tom Fitton and Larry Klayman dated April 26, 20041181Media Advisory dated September 23, 2003	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES	
10611Polygraph Determination dated October 15, 2007 administered by James L, Wilt10711Children and Family Services Commissions Letter dated May 2, 20081081Letter from Assistant Prosecuting Attorney David Zlimmerman dated September 17, 200010911United States District & Bankruptcy Courts, Good Standing Certificate May 1, 201411011Certificate of Disciplinary History Pennsylvania dated July 30, 2013, Renee Weber11111District of Columbia Court of Appeals, Good Standing Certificate dated March 20, 201311211Severance Agreement dated September 19, 200311411C-SPAN letter dated April 27, 200711611December 12, 2004 Letter to Mr. Barmak and Ms. Jarquin11711Email Correspondence between Tom Fitton and Larry Klayman dated April 26, 200411811Media Advisory dated September 23, 2003				Orly Taitz Affidavit dated March 26, 2014	
10711111107111<				Orly Taitz Affidavit dated March 20, 2014	
Image: Second				Polygraph Determination dated October 15, 2007 administered by James L. Wilt	
109111110911111111011211111111113111111111141111111111511111111116111111111711111111181111111119111111111111111111121111111113111111111411111111151111111116111111111711111111181111111 <t< td=""><td></td><td></td><td></td><td>Children and Family Services Commissions Letter dated May 2, 2008</td></t<>				Children and Family Services Commissions Letter dated May 2, 2008	
110Certificate of Disciplinary History Pennsylvania dated July 30, 2013, Renee Weber111District of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013112The Florida Bar, Good Standing dated March 20, 2013 by Johnny Smith113Severance Agreement dated September 19, 2003114Letter, Breach of Contract dated April 26, 2004115C-SPAN letter dated April 27, 2007116December 12, 2004 Letter to Mr. Barmak and Ms. Jarquin117Email Correspondence between Tom Fitton and Larry Klayman dated April 26, 2004118Media Advisory dated September 23, 2003				Letter from Assistant Prosecuting Attorney David Zimmerman dated September 17, 2008	
111Image: Construct of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013112Image: Construct of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013112Image: Construct of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013113Image: Construct of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013113Image: Construct of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013113Image: Construct of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013114Image: Construct of Construct Construct dated April 26, 2004115Image: Construct On Construct dated April 26, 2004116Image: Construct On Construct				United States District & Bankruptcy Courts, Good Standing Certificate May 1, 2014	
112   Image: Constraint of the florida Bar, Good Standing dated March 20, 2013 by Johnny Smith     113   Image: Constraint of the florida Bar, Good Standing dated March 20, 2013 by Johnny Smith     113   Image: Constraint of the florida Bar, Good Standing dated March 20, 2013 by Johnny Smith     113   Image: Constraint of the florida Bar, Good Standing dated March 20, 2013 by Johnny Smith     113   Image: Constraint of the florida Bar, Good Standing dated April 26, 2003     114   Image: Constraint of Contract dated April 26, 2004     115   Image: Constraint of Contract dated April 27, 2007     116   Image: Constraint of Contract dated April 27, 2007     116   Image: Constraint of Contract dated April 27, 2007     117   Image: Constraint of Contract dated April 27, 2003     118   Image: Constraint of Contract dated September 23, 2003				Certificate of Disciplinary History Pennsylvania dated July 30, 2013, Renee Weber	
113   Severance Agreement dated September 19, 2003     114   Letter, Breach of Contract dated April 26, 2004     115   C-SPAN letter dated April 27, 2007     116   December 12, 2004 Letter to Mr. Barmak and Ms. Jarquin     117   Email Correspondence between Tom Fitton and Larry Klayman dated April 26, 2004     118   Media Advisory dated September 23, 2003				District of Columbia Court of Appeals, Good Standing Certificate dated March 20, 2013	
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115   Image: Constraint of the state of				Severance Agreement dated September 19, 2003	
116   Image: Constraint of the state of				Letter, Breach of Contract dated April 26, 2004	
117   Image: Contract of the second				C-SPAN letter dated April 27, 2007	
118 Media Advisory dated September 23, 2003			,	December 12, 2004 Letter to Mr. Barmak and Ms. Jarquin	
				Email Correspondence between Tom Fitton and Larry Klayman dated April 26, 2004	
119   Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for Southern District of Florida     Image: Certificate of Good Standing for				Media Advisory dated September 23, 2003	
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### **EXHIBIT AND WITNESS LIST – CONTINUATION**

		Klaymar	<u>רייייי</u>	· V:	s. Judicial Watch, Inc.	1115-6v-20610-CMA	
PLF. NO.					DESCRIPTION OF EXHIBITS AND WITNESSES		
					WITNESSES		
1					Orly Taitz, 29839 Santa Margarita Parkway, Sulte	100, Rancho Santa Margarita CA 92688	
2					Constance Ruffley, 2549 Huntington Drive, Suite 2	201, San Marino CA 91108	
з					Larry Klayman, 2520 Coral Way, Suite 2027, Mian	ni, FL 33145	
4					Tom Fitton, 425 Third Street SW, Suite 800, Wash	ington, DC 20024	
5		****			Paul Orfanedes, 425 Third Street SW, Suite 800, V	Washington, DC 20024	
6					Christopher Farrell, 425 Third Street SW, Suite 80	0, Washington, DC 20024	
7					Sandra Cobas, 1071 S.W. 8th St., Miami, FL 3313	0	
8					Jose Basulto		
9					George Miller		
10					Sam Naples		
11					Donato Dalrympie		
12					Naveed Mahboobian		
13					Tom Madden, 240 W Palmetto Park Rd, Boca Raton, FL 33432		
14					Adrienne Madden, 240 W Palmetto Park Rd, Boca Raton, FL 33432		
15					Pino Cignarella		
16					Louise Benson		
17					Michael Voeltz		
18					Willy Chirino		
19					Lissette Chirino		
20					Bob Barr		
21					Helen Aguirre		
22					Michael Schiavo		
23					Ursula Ungaro		
24					Pastor Dan Johnson		
25					Oscar Garcia		
26					Marici Orourt		

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#### **CERTIFICATE OF SERVICE**

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

<u>/s/ Larry Klayman</u> LARRY KLAYMAN

Plaintiff Pro Se

#### SERVICE LIST

#### **Douglas James Kress**

Schwed Kahle & Jenks, P.A. 11410 North Jog Road Suite 100 Palm Beach Gardens, FL 33418 561-694-0070 Fax: 561-694-0057 Email: dkress@schwedpa.com

VIA CM/ECF