

UNITED STATES DISTRICT COURT

Southern

DISTRICT OF

Florida

Klayman

EXHIBIT AND WITNESS LIST

V.
Judicial Watch, Inc.

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

PRESIDING JUDGE The Honorable Cecilia M. Altonaga					PLAINTIFF'S ATTORNEY Larry Klayman, Esq.	DEFENDANT'S ATTORNEY Douglas Kress, Esq.
TRIAL DATE (S) 5/19/2014-6/2/2014					COURT REPORTER	COURTROOM DEPUTY
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					Feb. 23, 2012 posting "My yesterday's presentation to CCIR and update on Article2SuperPac..."	
2					Feb. 26, 2012 posting "Clarification Regarding Article2Legal 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 Statements" by George Miller and Pamela Barnett	
5					"When a Paper Terrorist Meets a Paper Terrorist" of Feb. 23, 2012	
6					Free Republic Email Correspondence	
7					UROC Cover, Emails from Constance Ruffley 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, 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, 2012 -- provided recently by George Miller	
15					Email between Constance Ruffley, Tom Fitton, Paul Orfanedes and Chris Farrell and others	
16					Email Correspondence between Constance Ruffley and Others regarding Larry Klayman	
17					Letter From Isabelle Klayman to her Father, Larry Klayman	
18					Letter From Isabelle Klayman to Her then Stepmother, Diana Klayman	
19					Picture Drawn by Isabelle Klayman for her Father, Larry Klayman	
20					Father's Day Card from Isabelle Klayman to Her Father, Larry Klayman	
21					Father's Day Card from Isabelle Klayman to Her Father, Larry Klayman	
22					Envelope from Isabelle Klayman to her Father Larry 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

Klayman		vs.			Judicial Watch, Inc.	CASE NO. 1:13-cv-20610-CMA
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES	
23					Family Photos of Larry Klayman, Diana Klayman and Children	
24					Family Photos of Larry Klayman, Diana Klayman 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 Klayman	
28					Family Photos of Larry Klayman and Isabelle Klayman	
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 Larry Klayman – Payment, June 4, 2012	
45					Emails between George Miller and Klayman, Voeltz v. Obama et al, Ballot Challenge May 7, 2012	
46					Emails between George Miller and Larry Klayman – Retention Agreement with Klayman, Feb. 8, 2012	
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 February 26, 2012	

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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 Devin 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 programa..." 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 on 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. Reno INS United States Court of Appeals, Eleventh Circuit	

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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 was dying of cancer" Nov. 10, 2005	
83					St. Petersburg Times – Watchdogs do their own recount in Palm Beach dated Nov. 29, 2000	
84					Front and Back Copy of the book "Whores" by Larry Klayman	
85					"Avoid False Accusations of Child Sexual Abuse"	
86					"The Nuclear Option: False Child Sexual Abuse Allegations 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 Tom 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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					WITNESSES	
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	
3					Larry Klayman, 2520 Coral Way, Suite 2027, Miami, FL 33145	
4					Tom Fitton, 425 Third Street SW, Suite 800, Washington, DC 20024	
5					Paul Orfanedes, 425 Third Street SW, Suite 800, Washington, DC 20024	
6					Christopher Farrell, 425 Third Street SW, Suite 800, Washington, DC 20024	
7					Sandra Cobas, 1071 S.W. 8th St., Miami, FL 33130	
8					Jose Basulto	
9					George Miller	
10					Sam Naples	
11					Donato Dalrymple	
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	

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.

/s/ Larry Klayman

LARRY KLAYMAN

Plaintiff Pro Se

SERVICE LIST

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VIA CM/ECF