

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 13-20610-CIV-ALTONAGA/Simonton

LARRY E. KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH, INC.,

Defendant.

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

Plaintiff, Larry Klayman, states the following objections to Defendant’s Pre-Trial

Disclosure of Exhibits and Witnesses:

Legend for Objections:

A-Authenticity

R-Relevancy

H-Hearsay

UP-Unduly prejudicial

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES	<u>OBJECTION</u>
	1				Certified copy of September 24, 2009 Judgment Entry from <i>Larry Elliot Klayman v. Stephanie Ann DeLuca</i> , Court of Common Pleas Domestic Relations Cuyahoga County, Ohio, Case No. DR07 316840	R, H, UP
	2				Certified copy of June 24, 2011 Judgment Entry from <i>Larry Elliot Klayman v. Stephanie Ann DeLuca</i> , Court of Common Pleas Domestic Relations Cuyahoga	R, H, UP

					County, Ohio, Case No. DR07 316840	
	3				January 24, 2012 Indictment from <i>State of Ohio v. Larry Klayman, Cuyahoga</i> Court of Common Pleas, Criminal Court Division, Case NO. 558506-12-CR	A, R, H, UP
	4				March 16, 2010 Capias for Larry Klayman from <i>Larry Elliot Klayman v. Stephanie Ann DeLuca</i> , Court of Common Pleas Domestic Relations Cuyahoga County, Ohio, Case No. DR07 316840	A, R, H, UP
	5				Certified copy of Capias on Indictment dated March 16, 2012 from <i>State of Ohio v. Larry Klayman, Cuyahoga</i> Court of Common Pleas, Criminal Court Division, Case NO. 558506-12-CR	R, UP
	6				Motion to Continue Arraignment dated March 9, 2012 from <i>State of Ohio v. Larry Klayman, Cuyahoga</i> Court of Common Pleas, Criminal Court Division, Case No. 558506-12-CR	A, R, H, UP
	7				Press Release from Cuyahoga County Prosecutor dated February 3, 2012	A, R, H, UP
	8				Email from Larry Klayman to Orly Taitz dated February 24, 2012 at 4:22 PM	None
	9				Email from Larry Klayman to Orly Taitz dated February 26, 2012 at 9:39 AM	None
	10				Email from Orly Taitz to Larry Klayman dated February 26, 2012 at 9:45 AM	None
	11				Email from Larry Klayman to George J. Miller dated February 8, 2012 at 9:44 AM	None
	12				Amended Complaint from <i>Michael C. Voeltz v. Barck Hussein Obama, et al</i> , Circuit Court of the Second Judicial Circuit in and for Leon County, Florida,	None

					Case No. 2012CA00467	
	13				Complaint Contesting Election of Barack Hussein Obama from <i>Michael C. Voeltz v. Barack Hussein Obama</i> , Circuit Court of the Second Judicial Circuit in and for Leon County, Florida, Case No. 2012CA003857	None
	14				Email from Larry Klayman to George Miller dated May 7, 2012 at 8:43 PM	None
	15				Email from George Miller to Larry Klayman dated May 7, 2012 at 10:06 PM	None
	16				Billing Statement from Klayman Law Firm dated July 23, 2012	None
	17				Email from Larry Klayman to George J. Miller dated August 9, 2012 at 3:39 PM	None
	18				Memorandum Opinion dated October 14, 2009 from <i>Larry Klayman v. Judicial Watch, Inc.</i> , U.S. Dist. Court for the District of Columbia, Civil Action No. 06-670 (CKK)	A, R, H, UP
	19				Order dated October 14, 2009 from <i>Larry Klayman v. Judicial Watch, Inc.</i> , U.S. Dist. Court for the District of Columbia, Civil Action No. 06-670 (CKK)	A, R, H, UP
	20				Order dated May 13, 2009 from <i>Jared Paul Stern v. News Corporation</i> , U.S. Dist. Court for the Southern District of New York, Case No. 08 Civ. 7624 (DAB).	A, R, H, UP
	21				Complaint of the Florida Bar from <i>The Florida Bar v. Larry Elliot Klayman</i> , dated February 4, 2011, with all exhibits including February 9, 2009 Mediation Settlement Agreement, hand-written note	A, R, H, UP

					from Larry Klayman dated June 18, 2009, and letter from Larry Klayman dated June 19, 2009.	
	22				Approval of Referee Report and Referee Report from <i>The Florida Bar v. Larry Elliot Klayman</i> , Supreme Court of Florida Case No. SC11-247	A, R, H, UP
	23				Consent Judgment dated July 14, 2011 from <i>The Florida Bar v. Larry Elliot Klayman</i> , Supreme Court of Florida Case No. SC11-247	A, R, H, UP
	24				Complaint from <i>Larry Klayman v. Roger L. Kleinman</i> dated February 4, 2013 from U.S. Dist. Court for the Southern District of Florida, Case No. 1:13-cv-20423-JLK.	A, R, H, UP
	25				Complaint and Petition for Mandamus Against Honorable Colleen Kolar Kotelly and Chief Judge David Sentelle and Judicial Ethics Bodes, dated October 5, 2011 from <i>Larry Klayman v. Honorable Colleen Kollar-Kotelly</i> , U.S. Dist. Court for the District of Columbia, Case No. 1:11-cv-01775-RJL.	A, R, H, UP
	26				Petition for Writ of Mandamus dated August 14, 2013 from <i>In Re: Larry Klayman</i> , United States Court of Appeals for the District of Columbia, Case No. 13-5258.	A, R, H, UP
	27				Petition for Rehearing and Rehearing En Banc from <i>In Re: Larry Klayman</i> , United States Court of Appeals for the District of Columbia, Case No. 13-5258.	A, R, H, UP
	28				Complaint dated June 6, 2013 from <i>Larry Klayman v. Lawrence R. Loeb</i> , Case No. 5:13-cv-00267-WTG-PRL.	A, R, H, UP

29				Amended Complaint dated July 2, 2013 from <i>Larry Klayman v. City Pages</i> , Case No. 5:13-cv-00143-ACC-PRL.	A, R, H, UP
30				Second Amended Complaint dated December 6, 2013 from <i>Larry Klayman v. City Pages</i> , Case No. 5:13-cv-00143-ACC-PRL.	A, R, H, UP
31				Complaint dated June 18, 2009 from <i>Larry Klayman, et al v. Diana Yazbeck Mejia, et al</i> from Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, Case No. 09-046701.	A, R, H, UP
32				Complaint from dated March 31, 2011 from <i>Larry Klayman v. Mark Zuckerberg, et al</i> from Superior Court of the District of Columbia Civil Division, Case No. 0002481-11.	A, R, H, UP
33				Magistrate's Decision dated June 9, 2010 from <i>Larry Elliot Klayman v. Stephanie Ann DeLuca</i> , Court of Common Pleas Domestic Relations Cuyahoga County, Ohio, Case No. DR07 316840	A, R, H, UP
34				Amended Magistrate's Decision dated July 2, 2010 from <i>Larry Elliot Klayman v. Stephanie Ann DeLuca</i> , Court of Common Pleas Domestic Relations Cuyahoga County, Ohio, Case No. DR07 316840	A, R, H, UP
35				Petitioner Larry Klayman's Brief Regarding Child Support dated June 23, 2010 from <i>Larry Elliot Klayman v. Stephanie Ann DeLuca</i> , Court of Common Pleas Domestic Relations Cuyahoga County, Ohio, Case No. DR07 316840	A, R, H, UP
36				Appellant's Amended Petition for Rehearing and Rehearing En Banc dated	A, R, H, UP

					June 19, 2013 from <i>Larry Klayman v. Honorable Colleen Kollar-Kotelly, et al</i> , United States Court of Appeals for the District of Columbia, Case No. 12-5340	
	37				Letter from Attorney Richard Driscoll to Larry Klayman dated March 5, 2012	None
	38				Email from Larry Klayman to Richard Driscoll dated February 23, 2012 at 10:24 AM	None
	39				Email from Larry Klayman to Richard Driscoll dated February 24, 2012 at 10:24 AM	None
	40				February 25, 2012 "Update on Article2superpac" from the www.orlytaitzesq.com website	None
	41				February 22, 2012 website posting "I received an email from Pamela Barnett, who stated that Larry Klayman is no longer associated with Article2 Superpac" from the www.orlytaitzesq.com website	None
	42				February 11, 2012 website posting "Great new in FL" with comments from the www.orlytaitzesq.com website.	None
	43				Memorandum Opinion dated April 8, 2014 from <i>Strange v. Islamic Republic of Iran</i> , United States District Court for the District of Columbia, Civil Action No. 14-435 (CKK).	A, R, H, UP
	44				Memorandum Opinion Granting Special Motion to Dismiss dated April 18, 2014 from <i>Vincent Forras v. Imam Feisal Abdul Rauf</i> , United States District Court for the District of Columbia, Case No. 12-00282 (BJR)	A, R, H, UP

45				Complaint dated February 21, 2012 from <i>Vincent Forras v. Imam Feisal Abdul Rauf</i> , United States District Court for the District of Columbia, Case No. 12-00282 (BJR)	A, R, H, UP
46				Larry Klayman, Failed Lawyer, By Terry Krepel August 9, 2012	A, R, H, UP
47				Klayman Watch, By David Corn March 29, 2004	A, R, H, UP
48				The Committee to Expose Dishonest and Incompetent Judges, Attorneys and Public Officials, Attorney Larry Klayman of DC ¹ , February 2013	A, R, H, UP
49				Larry Klayman, Conservative Wingnut Lawyer, Gets Reprimanded by Florida Bar, Is Broke, by Gus Garcia-Roberts, November 1, 2011	A, R, H, UP
50				1 Judge Who Can Save America, by Larry Klayman dated February 19, 2012	A, R, H, UP
51				Order dated September 7, 2007 from <i>Jared Paul Stern v. Ronald Burkle, et al</i> , Supreme Court of the State of New York County of New York, Case No. 103916/2007	A, R, H, UP
52				Complaint dated November 1, 2007 from <i>Larry Klayman v. David Barmak, et al</i> , filed in the Circuit Court of the 11 th Judicial Circuit in and for Miami-Dade county, Florida, Case No. 07-37307CA20	A, R, H, UP
53				Larry Klayman, professional “lunatic” dated December 18, 2013 by p m carpenter	A, R, H, UP

¹ The remainder of the title is derogatory and is therefore not included in this list.

54				Larry Klayman Asks If Joe Arpaio Recall Chairman is “Homo” Who “Want[s] My Nuts” dated March 22, 2013 by Matthew Hendley	A, R, H, UP
55				Larry Klayman Sues <i>New Times</i> , Is Really Weird dated March 25, 2013 by Matthew Hendley	A, R, H, UP
56				Who’s Crazier: Bradlee Dean or Larry Klayman dated March 28, 2013 by Steve Timmer	A, R, H, UP
57				DOOFUS OF THE DAY: Larry Klayman Blames Jews for Gay Marriage, IRS Scandal dated May 28, 2013 by The Vicious Babushka	A, R, H, UP
58				Wingnut of the Day: Larry Klayman dated September 26, 2013 by Pushing Rope	A, R, H, UP
59				The good virgin’s birther case dated December 8, 2012 by Larry Klayman	A, R, H, UP

DEFENDANT’S WITNESS LIST

1				Constance Ruffley, 2549 Huntington Drive, Suite 201, San Marino, CA 91108 Expects to call witness	OBJECTION None
2				Plaintiff, Larry E. Klayman Expects to call witness	None
3				Paul Orfanedes, 425 Third Street SW, Suite 800, Washington, DC 20024 Expects to call witness	None
4				Thomas Fitton, 425 Third Street SW, Suite 800, Washington, DC 20024 Expects to call witness	None
5				Christopher Farrell, 425 Third Street SW,	None

					Suite 800, Washington, DC 20024 Expects to call witness	
	6				Orly Taitz, 29839 Santa Margarita Parkway, Suite 100, Rancho Santa Margarita, CA 92688 If necessary.	None

Dated: **May 13, 2014**

Respectfully submitted,

/s/ Larry Klayman _____
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 leklayman@gmail.com
 Plaintiff Pro Se

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