

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

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

LARRY KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH,

Defendant.

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**PLAINTIFF'S SUPPLEMENT TO OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Larry Klayman, hereby moves this Court for leave to file the affidavit of Orly Taitz, attached as Attachment 1, as a supplement to Plaintiff's Opposition to Defendant's Motion for Summary Judgment, and as grounds therefore would show:

1. Plaintiff filed an opposition to Defendant's Motion for Summary Judgment on March 17, 2014.
2. At issue in this lawsuit are the defamatory statements made by Defendant Judicial Watch, through Constance Ruffley, to Orly Taitz on or about February 22, 2012.
3. Plaintiff anticipated receiving an affidavit from Orly Taitz by March 17, 2014 that would have confirmed further the statements made by Defendant Judicial Watch to Taitz. However Plaintiff was not able to obtain a signed, notarized copy of Taitz affidavit until now.
4. Taitz's affidavit provides authentication of the appearance of the postings made on her website.

5. Taitz's affidavit also provides further evidence that proves that the statements published on her website are accurate of what Defendant offered up and told her on or about February 22, 2012.
6. Taitz has also agreed to appear as a witness at trial to commence on May 19, 2014.
7. Plaintiff contacted Defendant's counsel to seek consent for this motion. Defendant's counsel does not consent to this motion.

WHEREFORE, Plaintiff respectfully requests that this Court accept the attached affidavit as a supplement to Plaintiff's Opposition to Defendant's Motion for Summary Judgment.

Dated: March 20, 2014

Respectfully submitted,

/s/ Larry Klayman  
LARRY KLAYMAN  
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Miami, FL 33145  
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Plaintiff Pro Se

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 20, 2014, I electronically filed the foregoing document 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

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VIA CM/ECF