

Syranon

- Request for Office depo is out of hand
- Only reason is to see if tapes held by Syranon are true + accurate
- He's been harassed enough - π filed 4 suits against him.
- Who won ABC suit
- ABC pd \$1.2 mill
- Suit was absurdly long + π was still putting on the case
- It went last that long before me
- Brandon knew abt the tape library.
- He listened to some eg. New Relig Postive tape.
- That tape has been played on TV + radio often.
- ABC lawsuit was known
- I spent 1 1/2 days talking to Brandon abt suits
- He knew abt Shirk Table Summaries bc they were seized during arrest. Brandon saw them
- He knew abt weapons purchase etc.
- Review office sent his "no charge" det. back. That was a political q
- Shirk didn't do a complete review. He was only concerned w/ AD-CAP (Activities, Gifts + Purchases)
- Cal filed a suit saying Contable \$ was misused. That was dismissed
- Shirk spent little t, Brandon spent 6 wks
- Brandon's knowledge is crucial.
- I'll submit written papers if nec.
- If Office only kept tape summaries, depo isn't nec.
- I'll show good cause if nec.
- gpt will respond + your reply
- Order - Confer + attempt to agree on material facts - submit a jt. statement
- We can have a mini-trial on facts legitimately in dispute
- World that helps here.
- Prob not.
- That + we tried we could agree on ϕ

J What if I preside?

π I think that would help

D We tried - gave our statement

Now π is to dispute facts he will

J I want to cut thru that

D I suggest π stip that these are Syrian records

π I don't know if they are

J Find out. How long?

π 10 days

J No depositions 'til respond

Respond to notice by Fri - D + address of discovery of ^{offset} Brandon
Reply π?

π Yes - Next Fri

J Set D know by tomorrow if other depositions are at issue

π Oppose notice by May 2^d

π Refer us to Magistrate to narrow issues?

J I'll think about it

Maybe Magistrate, maybe another J

1 1/2 hr conference with conf

D Will you fix a date for stip?

10 days - March 31?

J ok

D Schedule is confirmed

J Work it out. Get everything done by May 2^d

π Do you work for Syrian govt?

π Yes. I've been a resident for 10 yrs

Q Is Brandon Depo is nec. unless we can get an affidavit
A Why would you deny access to Brandon for an "
A All we rely on is his own records except vol 8 which
is summary of Syraam's own tape recordings
Discovery for Ophee not needed

Tapes were disclosed to Ophee in connection w/ libel
suit against ABC

Brandon prep'd no exhibits. Exhibits were Syraam's
'78 Syraam had 103 suits pending. Does anyone
criticize of Syraam

Q Answer go abt Brandon + Ophee

A Brandon said he had no access to this info. Depo will
show he did

Brandon de'd lawsuits were nec. + proper

We must show it was engaging in suitable activities + actions
comprised of departure from " purpose.

Q Can you rep Brandon ^{didn't see} this info?

A Yes. For example, Brandon only saw 1 set of it's minutes
Got Ex 4 = real minutes

Brandon wasn't aware of it's elaborate taping system

eg. Think Table Summaries weren't disclosed - talks abt
Holy War - intimidation

Brandon knew none of this

Q Basis of alleged facts wasn't known by Brandon

A He balk. I can't say none of them

Q Brandon did the act

A Shui did the act -> revelation.

Brandon participated

What an Agent thinks not relevant. It must show that
it's exempt

Q Does law say that

A Yes

Q You shall respond to this extensive problem

Syracuse SC 3/21

- π We filed papers this morning
Q We read it
π I have it to add to the papers
We didn't file an affidavit bc it's not read in this
Court
- Q Statement of Facts
π May req extensive discovery
I haven't reviewed it yet
Q It's less than 9 feet
π We have a heavy burden
Q Only need show a dispute of a material fact
π It will take $\pm$ to prepare
Q I see no need for discovery
Clients should have all the answers you need
Trial cut sheet $\rightarrow$ continuing duty
You should amend bc to Ct prior ruling
- π We'll limit us
Q This is too much $\pm$
Now says exhibits weren't part of admin record - but you're
familiar w/ all of them
- π A for Fed since Jan. to prepare. Told us abt it
then
We ask for $\pm$ - til June 1
We'll do a thorough job - laid things down
Statements from a Sociologist we've never seen - Dr O'shee
- Q May 16th Monday
Discovery needed?
π Dr O'shee
Q Objection?
Q Yes. It took his dep for 4-6 days in another case
π Case is unrelated. go see different
They rely on O'shee for many statements of material fact
I'll only take depositions if nec.