

82-2303 Synopsis

T Am from Cal

Iy Admitted here?

T You allowed pro bono on Sept 30, 1980 Order

Iy Local counsel?

T Yes

Iy You concerned abt # of ws
Discovery?

T June 1, 1983

Many ws are in cal.

Do we in D.C. - coord. problems

If no problems we can complete discovery before then

Agents audited for 20 days

Iy What will experts testify too?

T 1 q is what = std of clothes + dryers
charitable + religious activities
etc aspects of church
etc.

T I want add t to respond to Motion to Strike by demand

D Thats ok w/me

We are trying to decomplicate this one - this explains our
Motions

We don't see why so many ws are needed

T 3 ws went in Cal

Iy Why file here

T Stat says it

D Must be filed here or claim it

T 2201 gives you rt

Iy Stats don't j stat - doesn't give rt to jd

T Rule 57

Iy I don't think you can get a jif

T Will reevaluate & maybe withdraw the Motion

Iy File statement of contentions & proof

T by Dec 15

D by 1/3

Jy Confer after file contentious.
File certification w/ CT that confer to define &
limit the issues
I want hear this many WS
Extension to 29th
Jy Not for Jy demand
Ok on jd q
Present a discovery plan by 11/30
A Our discovery is by way of rebuttal
Can we respond to TTS discovery plan?
Jy OK
D respond to TTS plan by 12/10 - presenting your plan