

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 from O'Jhee not needed

Tapes were disclosed to O'Jhee in connection w/ libel suit against ABC

Brandon prep'd no exhibits. Exhibits were Syraam's

'78 Syraam had 103 suits pending. Does anyone critical of Syraam

Q Answer go abt Brandon + O'Jhee

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

Brandon det'd lawsuits were nec. + proper

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

Q Can you rep Brandon <sup>didn't see</sup> 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 his 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 more of than

Q Brandon did the admt

A Shui did the admt -> rec'd

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  
by We need it  
π I have to add to the papers  
We don't file an affidavit be it's not read in this  
Court  
by Statement of Facts  
π May req extensive discovery  
I haven't reviewed it yet  
by It's less than a foot  
π We have a heavy burden  
by Only need show a dispute of a material fact  
π It will take  $\pm$  to prepare  
by I see no need for discovery  
Clients should have all the answers you need  
Trial cut sheet  $\rightarrow$  cont'ing duty  
You should amend be to Ct's prior ruling  
π Well limit us  
by This is too much  $\pm$   
Now says exhibits weren't part of admin record - but you're  
familiar w/ all of them  
π  $\Delta$  for Fed some Jan. to prepare. Tell us abt it  
then  
We ask for  $\pm$  - til June 1  
We'll do a thorough job - laid things down  
Statements from a Sociologist were never seen - Dr O'phee  
by May 16<sup>th</sup> Monday  
Discovery needed?  
π Dr O'phee  
by objection?  
D Yes. It took his dep for 4-6 days in another case  
π Case is unrelated. go see different  
They rely on O'phee for many items of material fact  
I'll only take dep if see.