

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MALEK JANDALI,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 1:11-cv-01484 (RBW)
)	
AMERICAN-ARAB ANTI-DISCRIMINATION)	
COMMITTEE)	
)	
Defendant.)	
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**PLAINTIFF MALEK JANDALI'S FIRST SET OF INTERROGATORIES TO THE
AMERICAN-ARAB ANTI-DISCRIMINATION COMMITTEE**

Plaintiff Malek Jandali, pursuant to Federal Rules of Civil Procedure 26 and 33, hereby requests that the Defendant American-Arab Anti-Discrimination Committee answer, in writing and under oath, the following Interrogatories, and serve a copy of such answers upon counsel for Malek Jandali within thirty (30) days from the date of service of these interrogatories.

INSTRUCTIONS

A. Unless otherwise specified, the time period applicable for these Interrogatories is from January 1, 2008 to the present.

B. You are under a continuous obligation to supplement your answers to these Interrogatories under the circumstances specified in Federal Rule of Civil Procedure 26(e).

DEFINITIONS

The following definitions apply to these Interrogatories. The singular form includes the plural and vice-versa:

1. “ADC” means American-Arab Anti-Discrimination Committee.
2. “ADC Related Individuals” means the ADC’s officers, directors, employees, and agents.
3. “All” and “each” shall be construed as all and each.
4. “And” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
5. “Convention” means the 2011 ADC national convention in Washington, D.C. on June 11, 2011.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each individual that attended the Convention and specify their phone numbers and addresses.

RESPONSE:

INTERROGATORY NO. 2:

Identify each ADC Related Individual that attended the Convention and specify their titles.

RESPONSE:

INTERROGATORY NO. 3:

Identify each individual involved in the ADC's invitation to Malek Jandali to perform at the Convention.

RESPONSE:

INTERROGATORY NO. 4:

For each individual identified in response to Interrogatory No. 3 above, state the individual's role in deciding to invite Malek Jandali to perform at the Convention.

RESPONSE:

INTERROGATORY NO. 5:

Identify each individual involved in the ADC's revocation of Malek Jandali's invitation to perform at the Convention.

RESPONSE:

INTERROGATORY NO. 6:

For each individual identified in response to Interrogatory No. 5 above, state the individual's role in deciding to revoke Malek Jandali's invitation to perform at the Convention.

RESPONSE:

INTERROGATORY NO. 7:

If it is the ADC's position that it did not revoke Malek Jandali's invitation to perform at the Convention, describe all efforts used by the ADC to secure Malek Jandali's attendance at the Convention.

RESPONSE:

INTERROGATORY NO. 8:

Identify each individual involved in the decision to play the song “Watani Ana” at the Convention.

RESPONSE:

INTERROGATORY NO. 9:

For each individual identified in response to Interrogatory No. 8 above, specify their role in making the decision on behalf of the ADC to play the song “Watani Ana” at the Convention.

RESPONSE:

INTERROGATORY NO. 10:

Identify all efforts made by the ADC to secure the right to play the song “Watani Ana” at the Convention.

RESPONSE:

INTERROGATORY NO. 11:

Identify all accounting books and records kept by the ADC regarding the Convention, including their authors and where they are stored.

RESPONSE:

INTERROGATORY NO. 12:

Identify the individual or individuals who were responsible for accounting for all revenues and expenses related to the Convention on behalf of the ADC.

RESPONSE:

INTERROGATORY NO. 13:

Identify the total amount of revenue the ADC received related to the Convention.

RESPONSE:

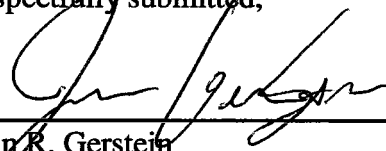
INTERROGATORY NO. 14:

Identify all licenses and/or permissions the ADC had to play the song “Watani Ana” at the Convention.

RESPONSE:

Dated: February 1, 2012

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 1, 2012, I caused the forgoing Plaintiff Malek Jandali's First Set of Interrogatories to The American-Arab Anti-Discrimination Committee to be served on the following counsel of record via First Class Mail and email.

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