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Attorney for Defendant

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

MALEK JANDALI,	)	
	)	
Plaintiff,	)	
	)	FRCP 26(a)(1)
	)	INITIAL DISCLOSURE
v.	)	
	)	CIVIL ACTION No. 1:11 cv 01484
AMERICAN-ARAB ANTI-DISCRIMINATION	)	Hon. Judge Reggie B. Walton
COMMITTEE	)	
1732 Wisconsin Avenue, NW	)	
Washington, D.C. 20007,	)	
	)	
Defendant.	)	

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Pursuant to FRCP 26(a)(1), Defendant makes its mandatory initial disclosures as follows:

A. WITNESSES

- Sara Najjar-Wilson, Former President**  
American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007  
Tel.: 443-994-4325  
Email: [robert.sara.wilson@att.net](mailto:robert.sara.wilson@att.net)

Can testify regarding her communications with Jandali on logistical matters pertaining to his trip to and appearance at the Convention.

- Warren David, Current President**  
American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007  
Tel.: (202) 244-2990, Extension 110  
Email: [w david@adc.org](mailto:w david@adc.org)

Can testify to his minimal role in the events leading to the Convention regarding Jandali's performance.

3. **Dr. Safa Rifka, Chairman of the Board**

American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007

Phone: (202) 244-2990

Email: [srifka@comcast.net](mailto:srifka@comcast.net)

Can testify to communications he had with Jandali regarding his appearance, his request that Jandali be instructed not to give political commentary prior to his performance, and his participation in the decision to open the Saturday Night Gala with the playing of the YouTube presentation of Jandali's song "Watani Ana."

4. **Asaad Jebara, Vice-Chairman of the Board**

American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007

Phone: 973-568-5773

Email: [ajebara@zanadi.com](mailto:ajebara@zanadi.com)

Can testify to communications with Jandali regarding his performance, and to his (Jebara's) attempt to resolve the conflict regarding Jandali's performance.

5. **Jay Salkini, Treasurer of the Board**

American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007

Tel.: 410-336-6001

Email: [jsalkini@tecore.com](mailto:jsalkini@tecore.com)

Can testify to his communications with Jandali in an attempt to resolve the conflict regarding Jandali's performance. Can also testify to his communication to Jandali prior to the Saturday Gala that ADC would be opening the Gala by playing the YouTube version of the song.

6. **Nabil Mohamad, Vice-President**

American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007

Tel.: (202) 244-2990, Extension 115

Email: [nmohamad@adc.org](mailto:nmohamad@adc.org)

Can testify regarding the negotiation of terms of Jandali's appearance with Jandali's agent, and regarding his participation in the decision that the song Watani Ana would be played at the beginning of the Saturday Night Gala.

- 7. Laila Mokhiber, Membership Outreach Coordinator**  
American-Arab Anti-Discrimination Committee (ADC), 1732 Wisconsin Ave., NW,  
Washington, DC 20007  
Tel.: (202) 244-2990, Extension 109  
Email: [lmokhiber@adc.org](mailto:lmokhiber@adc.org)

Can testify regarding her responsibility for sending communication (alerts, press releases, updates) to ADC database and membership, and her responsibility for posting ADC information and material to ADC social networking sites, such as Facebook and Twitter. Can testify about imbedding internet link to Jandali's YouTube performance of "Watani Ana" on ADC's Facebook page.

- 8. Hussein Harb, Quake Entertainment**  
Phone: 703-386-6696  
Email: [harbhusein@gmail.com](mailto:harbhusein@gmail.com)

Can testify about being in charge of the audio/video equipment at the June, 2011 Convention. Can verify that the YouTube performance of "Watani Ana" at the Saturday Gala. was the source of the audio for the song that was played on June 11, 2011. He can also describe in detail the issues that arose which prevented the video itself from being shown on the screens within the banquet hall.

## B. DOCUMENTS

1. Any and all content of a Facebook page referred to as "malekjandalifanpage" and found at the following internet link: <http://www.facebook.com/malekjandalifanpage>. A copy is attached as Exhibit A.

2. *Terms of Service* for YouTube website, copy attached as Exhibit B.  
April 16, 2011 YouTube posting of *Malek Jandali: Watani Ana*, copy attached. The internet link used is: <http://www.youtube.com/watch?v=fjqR7H6YumE>.

3. Emails exchanged between Plaintiff and Defendant relating to the ADC Convention on June 11, 2011. Copies will be provided upon obtaining them.

## C. COMPUTATION OF DAMAGES

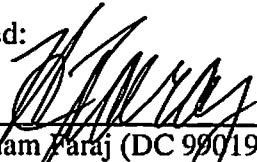
Not applicable.

## D. INSURANCE POLICIES

Not applicable.

Dated: Dec 8, 2011

Signed:



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*American-Arab Anti-Discrimination Committee*

## CERTIFICATE OF SERVICE

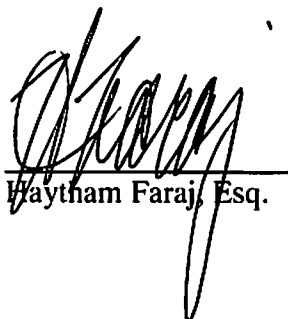
I hereby certify that on December 8, 2011, I caused Defendant AMERICAN-ARAB ANTI-DISCRIMINATION COMMITTEE'S INITIAL DISCLOSURES to be served by email and by U.S. Mail, postage prepaid, and properly addressed to the following counsel of record.

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*Attorneys for Plaintiff Malek Jandali*



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