

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

MALEK JANDALI, )

Plaintiff, )

v. )

AMERICAN-ARAB ANTI-DISCRIMINATION )  
COMMITTEE )

Defendant. )

---

CIVIL ACTION

NO. 1:11-cv-01484 (RBW)

---

**PLAINTIFF MALEK JANDALI'S FIRST SET OF DOCUMENT REQUESTS TO THE  
AMERICAN-ARAB ANTI-DISCRIMINATION COMMITTEE**

---

Plaintiff Malek Jandali, pursuant to Federal Rules of Civil Procedure 26 and 34, hereby requests that the Defendant American-Arab Anti-Discrimination Committee produce all documents responsive to the following document requests for copying at the offices of Troutman Sanders, LLP, 401 Ninth Street, N.W., Washington, D.C. 20004, or such other place as mutually agreed, within thirty (30) days from the date of service of these document requests.

**INSTRUCTIONS**

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

B. These document requests specifically seek the production of electronically stored information ("ESI") in native electronic form, including all metadata associated with the requested ESI.

C. These document requests seek documents that are in your possession, custody, control or knowledge or documents that are in the possession, custody or control of your servants, employees, agents, representatives or attorneys.

D. Each and every document requested should be produced in its entirety, without abbreviation or expurgation or “scrubbing” and including all attachments or other matters affixed thereto. If any metadata has been scrubbed, altered or otherwise removed from the native files, identify those files and state the reason for the removal or alteration of the metadata.

E. This request for production of documents seeks production of every version of the documents requested, including, but not limited to, copies of the documents with annotation or red-lining, additional attachments, indications of carbon copies, blind carbon copies or distribution lists and drafts and revisions of the documents.

F. This request for production of documents shall be deemed to be continuing. If you at any time subsequent to the production of documents in response hereto, and prior to the rendering of judgment in this action, obtain additional documents responsive to this request, you shall promptly provide such documents for inspection and copying in accordance with the Federal Rules of Civil Procedure.

G. If any of the requested documents cannot be produced in full, produce them to the extent possible, specifying the reasons for your inability to produce the remainder and stating whatever information, knowledge or belief you have concerning the unproduced portion.

H. If any requested document is withheld under a claim of privilege, a privilege log shall be produced.

I. All documents produced in response to this request shall be produced in an orderly manner and with appropriate markings or other identification so that Plaintiff will be able

to identify the source of the document, the file in which it was maintained and the person or entity to whom such file belonged.

J. All indices or similar documents that list, classify, organize, record, explain or enumerate responsive documents shall be produced along with responsive documents.

K. If any request is objected to as being unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents and the number of person hours and other costs required to conduct the search.

L. If any document requested no longer exists or has otherwise been disposed of, identify each document and state the date of, circumstances surrounding and reasons for its disposal; identify the persons responsible and the persons who have knowledge of said disposal; and provide all other information which would be of use in obtaining the document, a copy thereof or the information contained therein.

### **DEFINITIONS**

The following definitions apply to these Requests for Production of Documents. 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. "Concerning" means relating to, referring to, describing, evidencing or constituting.

6. “Convention” means the 2011 ADC national convention in Washington, D.C. on June 11, 2011.

7. “Document” is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

8. “Syria” means the Syrian Arab Republic.

9. “Syrian Government” means the government of the Syrian Arab Republic.

10. “Syrian Government Related Individuals” means agents, appointees, employees, and officials of the Syrian Government.

### **REQUESTS FOR PRODUCTION**

Please produce each of the following documents, along with all prior or subsequent drafts or versions thereof:

#### **REQUEST NO. 1:**

All guest lists and lists of attendees for the Convention.

#### **REQUEST NO. 2:**

All documents concerning the playing of the song “Watani Ana” at the Convention.

#### **REQUEST NO. 3:**

All documents concerning the ADC’s invitation to Malek Jandali to perform at the Convention.

**REQUEST NO. 4:**

All documents concerning the ADC's revocation of Malek Jandali's invitation to perform at the Convention.

**REQUEST NO. 5:**

All licenses or permissions the ADC has or had to broadcast, publish, or perform the song "Watani Ana."

**REQUEST NO. 6:**

All documents supporting or refuting the ADC's right to broadcast, publish, or perform the song "Watani Ana."

**REQUEST NO. 7:**

All documents showing revenues the ADC received from the Convention.

**REQUEST NO.8:**

All documents showing expenses the ADC incurred from the Convention.

**REQUEST NO. 9:**

The ADC's monthly balance sheet and income statement for any month where a transaction is recorded or reflected concerning the Convention.

**REQUEST NO. 10:**

All communications with Syrian Government Related Individuals concerning the Convention.

**REQUEST NO. 11:**

All communications with Syrian Government Related Individuals concerning Malek Jandali.

**REQUEST NO. 12:**

All communications with Syrian Government Related Individuals concerning the song “Watani Ana.”

**REQUEST NO. 13:**

All minutes of the ADC Board of Directors that mention Malek Jandali and/or Watani Ana.

**REQUEST NO. 14:**

All documents concerning ticket sales for the Convention.

**REQUEST NO. 15:**

All accounting records for the Convention.

**REQUEST NO. 16:**

All files of Safa Rifka, Assad Jebara, Sawssan Khoury, Nabih Ayad, Tawfiq Barqawi, Cheryl J. Faris, Rebecca Haddad, Dr. Isam Hawatmeh, and Farouk Shami concerning Malek Jandali and/or the song “Watani Ana.”

**REQUEST NO. 17:**

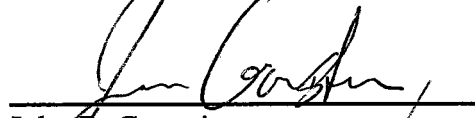
All files of Warren David, Nabil Mohamad, Imad Hamad, Laila Mokhiber, and Marvin Wingfield concerning Malek Jandali and/or the song “Watani Ana.”

**REQUEST NO. 18:**

All documents concerning the ADC's search for records regarding these Requests.

Dated: February 1, 2012

Respectfully submitted,



John R. Gerstein  
D.C. Bar No. 913228  
jack.gerstein@troutmansanders.com  
Prashant K. Khetan  
D.C. Bar No. 477636  
prashant.khetan@troutmansanders.com  
401 9<sup>th</sup> Street  
Suite 1000  
Washington, D.C. 20004  
Tel: (202) 274-2950

*Of Counsel*

Michael D. Hobbs, Jr.  
michael.hobbs@troutmansanders.com  
5200 Bank of America Plaza  
600 Peachtree Street, N.E.  
Atlanta, Georgia 30308-2216  
Tel: (404) 885-3000

Stuart Philip Ross  
stuart.ross@troutmansanders.com  
Steven W. McNutt  
steven.mcnutt@troutmansanders.com  
401 9<sup>th</sup> Street  
Suite 1000  
Washington, D.C. 20004  
Tel: (202) 274-2950

*Attorneys for Plaintiff Malek Jandali*

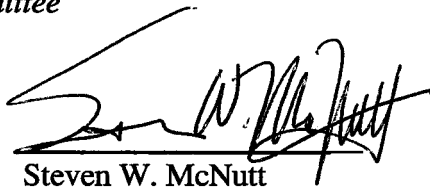
**CERTIFICATE OF SERVICE**

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

Haytham Faraj, Esq. (DC 990192)  
PUCKETT & FARAJ, P. C.  
1800 Diagonal Road, Suite 210  
Alexandria, VA 22314  
Tel. (703) 706-9566  
Fax (202) 318-7652  
Email: [Haytham@puckettfaraj.com](mailto:Haytham@puckettfaraj.com)

J. Michael Springmann  
LAW OFFICE OF J MICHAEL SPRINGMANN  
4619 Yuma Street, NW  
Washington, DC 20016  
(202) 686-4869  
Fax: (202) 966-1254  
Email: [attorney@springmannslaw.net](mailto:attorney@springmannslaw.net)

*Attorneys for Defendant  
American-Arab Anti-Discrimination Committee*

  
Steven W. McNutt