

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

MALEK JANDALI,)	
)	
Plaintiff,)	
)	
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.)	

REQUEST FOR ADMISSIONS TO PLAINTIFF

Defendant requests that Plaintiff admit for the purposes of this civil action only and subject to all pertinent objections as to admissibility, the following initial Requests for Admissions propounded pursuant in accordance with Rule 36, F.R.Civ.P.

Request No. 1: Please admit that you, or your duly authorized agent, posted your performance of “Watani Ana” to YouTube.com (hereafter “YouTube”) on April 16, 2011.

Request No. 2: Please admit the genuineness and authenticity of the YouTube post printout, dated April 16, 2011, a copy of which is attached for identification to this Request.

Request No. 3: Please admit the genuineness and authenticity of the *Terms of Service* – *YouTube* dated June 9, 2010, a copy of which is attached for identification to this Request.

Request No. 4: Please admit that you, or your duly authorized agent, accepted the YouTube *Terms of Service* prior to posting your performance of “Watani Ana” on YouTube.

Request No. 5: Please admit that neither you nor your duly authorized agent has removed the above – referenced post of your performance of “Watani Ana” from YouTube.

Request No. 6: Please admit that your application for a copyright registration of “Watani Ana” occurred after June 11, 2011.

Request No. 7: Please admit that any application you filed for a copyright registration of “Watani Ana” does not appear on the website of the United States Copyright Office.

Request No. 8: Please admit that any application you filed for a copyright registration of “Watani Ana” through the United States Copyright Office was not a matter of public knowledge on June 11, 2011.

Request No. 9: Please admit that you refused to make a personal appearance at Defendant’s June 11, 2011 event unless you could make a political statement during your performance.

Request No. 10: Please admit that you are aware that Defendant imbedded a copy of your YouTube post of “Watani Ana” in its public emails without complaint from you.

Request No. 11: Please admit that you are aware that Defendant included a copy of your YouTube post of “Watani Ana” in its posts to various social networking websites without complaint from you.

DATED this ____ day of ____ [*month/year*].

By: _____
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on _____, 2011, I electronically filed the foregoing paper with the Clerk of Court using the ECF system which will send notification of such filing to the following: Mr. Jack Gerstein at Jack.Gerstein@troutmansanders.com; Mr. Prashant Khetan at prashant.khetan@troutnmansanders.com; Mr. Michael Hobbs at michael.hobbs@troutmansanders.com, attorneys for Plaintiff.

Respectfully submitted,

_ /S/ Haytham Faraj____
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