

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA

THE UNIVERSITY OF SOUTH
FLORIDA BOARD OF TRUSTEES,
a public body corporate,

CASE NO. 02-7743

DIVISION B

Plaintiff,

vs.

SAMI AL-ARIAN,

Defendant.

NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM

TO: Mr. Robert F. McKee
Attorney for Sami Al-Arian
Kelly & McKee, P.A.
1718 E. 7th Avenue, Suite 301
P.O. Box 75638
Tampa, Florida 33675-0638

DEPONENT: SAMI AL-ARIAN

DATE/TIME: October 7, 2002, 9:30 a.m.

LOCATION: Thompson, Sizemore & Gonzalez, P.A.
501 East Kennedy, Suite 1400
Tampa, Florida 33602

PLEASE TAKE NOTICE that pursuant to Rule 1.310 and Rule 1.350, Fla.R.Civ.P., the Plaintiff, The University of South Florida Board of Trustees, will take the videotaped deposition, by oral examination, of the above named deponent, before official court reporters. The official court reporter will be Bay Area Reporting, 401 East Jackson Street, Suite 2320, Tampa, Florida 33602 and the videographer will be contracted for by them. The deposition is being taken for the purpose of discovery and/or for use at trial, or for such other purposes as are permitted under the Florida Rules of Civil Procedure.

The following documents, including memoranda, notes, records, applications, letters, e-mails, or other materials that may be used to support Defendant's case at trial are to be presented at the time of the deposition:

Documents from 1988 to the present relating to the incorporation of the Islamic Concern Project, Inc.; conferences and meetings of that organization; the incorporation of the World and Islam Studies Enterprise; conferences and meetings of that organization; bank account information relating to both organizations; fund raising and distribution of monies relating to both organizations; fund raising and distribution of monies to the Palestinian Islamic Jihad or to persons associated with the Palestinian Islamic Jihad.

Inspection of the above documents shall be permitted unless this request for documents is objected to, in which event the reasons for the objection shall be stated.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

R.B. FRIEDLANDER
Florida Bar No. 091121
Interim General Counsel

THOMAS M. GONZALEZ
Florida Bar No. 192341
Thompson, Sizemore & Gonzalez

University of South Florida
4202 E. Fowler Avenue, ADM 250
Tampa, FL 33620
Ph: (813) 974-2131
Fax: (813) 974-5236

501 East Kennedy, Suite 1400
P.O. Box 639
Tampa, FL 33601-0639
Ph: (813) 273-0050
Fax: (813) 273-0072
tgonzalez@tsg-law.com

and

GREGORY W. KEHOE
Florida Bar No. 468140
James, Hoyer, Newcomer, et al.
4830 W. Kennedy Blvd., Suite 147
Tampa, FL 33609-2517
Ph: (813) 286-4100
Fax: (813) 286-4174

and

BRUCE S. ROGOW
Florida Bar No. 067999
BEVERLY POHL
Florida Bar No. 907250
Bruce A. Rogow, P.A.
Broward Financial Centre
Suite 1930
500 East Broward Blvd.
Ft. Lauderdale, FL 33394
Ph: (954) 767-8909
Fax: (954) 764-1530
bapohl@bellsouth.net

By: 

BRUCE ROGOW

Counsel for University of South
Florida Board of Trustees