

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN FREEDOM DEFENSE  
INITIATIVE, PAMELA GELLER, and  
ROBERT SPENCER,

Plaintiffs,

v.

Case 2:10-cv-12134  
HON. DENISE PAGE HOOD

SUBURBAN MOBILITY AUTHORITY  
FOR REGIONAL TRANSPORTATION  
("SMART"); GARY L. HENDRICKSON,  
Individually and in his official capacity as  
Chief Executive of SMART, JOHN HERTEL,  
Individually and in his official capacity as  
General Manager of SMART and BETH  
GIBBONS, individually and in her official  
Capacity as Marketing Program Manager  
Of SMART,

Defendants.

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Robert J. Muise (P62849)  
David Yerushalmi, Esq. (Arz. 009616; DC  
978179, Cal. 132011; NY 4632568)  
Counsel for Plaintiffs  
3000 Green Rd., #131098  
Ann Arbor, MI 48113  
(855) 835-2352  
rmuise@americanfreedomlawcenter.org  
dyerushalmi@americanfreedomlawcenter.  
org

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Avery E. Gordon (P41194)  
Anthony Chubb (P72608)  
Co-Counsel for Defendants SMART,  
Hertel and Gibbons  
535 Griswold Street, Suite 600  
Detroit, MI 48226  
(313) 223-2100  
agordon@smartbus.org  
achubb@smartbus.org

Erin Elizabeth Mersino (P70886)  
Co-Counsel for Plaintiffs  
24 Frank Lloyd Wright Drive  
P.O. Box 393  
Ann Arbor, MI 48106  
(734) 827-2001  
emersino@thomasmore.org

John J. Lynch (P16887)  
Christian E. Hildebrandt (P46989)  
Co-Counsel for Defendants SMART,  
Hertel and Gibbons  
1450 W. Long Lake Road, Suite 100  
Troy, MI 48098  
(248) 312-2800  
jlynch@vgpclaw.com  
childebrandt@vgpclaw.com

## **DEFENDANT'S PRELIMINARY WITNESS LIST**

NOW COMES, Defendant, SUBURBAN MOBILITY FOR REGIONAL TRANSPORTATION, by and through its attorneys, VANDEVEER GARZIA, P.C., and for its PRELIMINARY WITNESS LIST of witnesses who may be called at trial in this matter, provide the following:

1. Pamela Geller, address refused
2. Robert Spencer, address refused
3. The following representatives of Plaintiffs may be called:
  - a. Richard Davis, 1040 1st Ave, PO Box 121, New York, NY 10022
  - b. Anders Gravers, 1040 1st Ave, PO Box 121, New York, NY 10022
  - c. John Joseph Jay, 1040 1st Ave, PO Box 121, New York, NY 10022
  - d. James Lafferty, 1040 1st Ave, PO Box 121, New York, NY 10022
  - e. Pamela Hall, 1040 1st Ave, PO Box 121, New York, NY 10022
  - f. Richard Davis, 1040 1st Ave, PO Box 121, New York, NY 10022
4. The following representatives of Suburban Mobility Authority for Regional Transportation may be called:
  - a. Anthony Chubb, 535 Griswold Ave, Ste 600. Detroit, MI 48226, as 30(b)(6) witness only.
  - b. Beth Gibbons, 535 Griswold Ave, Ste 600. Detroit, MI 48226
  - c. Elizabeth Dryden, 535 Griswold Ave, Ste 600. Detroit, MI 48226
  - d. John Hertel, 535 Griswold Ave, Ste 600. Detroit, MI 48226
  - e. Toni Toth, 535 Griswold Ave, Ste 600. Detroit, MI 48226
  - f. Steve Brown, 535 Griswold Ave, Ste 600. Detroit, MI 48226
  - g. Keith Taylor, 535 Griswold Ave, Ste 600. Detroit, MI 48226
5. The following representatives of CBS may be called:
  - a. Tom Carroll, 88 Custer Ave, Detroit, MI 48202
  - b. Robert Hawkins, 88 Custer Ave, Detroit, MI 48202
  - c. Jon Safier, 88 Custer Ave, Detroit, MI 48202
  - d. Greg Coyne, 88 Custer Ave, Detroit, MI 48202
  - e. Rob Shilling, 88 Custer Ave, Detroit, MI 48202
  - f. Mike Short, 88 Custer Ave, Detroit, MI 48202
  - g. Alysha Goodes, 88 Custer Ave, Detroit, MI 48202
  - h. Carol Lewis, 88 Custer Ave, Detroit, MI 48202
  - i. Richard Ament, 405 Lexington Ave, New York, NY

- j. David Posy, 405 Lexington Ave, New York, NY
  - k. Howard Marcus, 405 Lexington Ave, New York, NY
  - l. Eric Davis, 405 Lexington Ave, New York, NY
6. Gary L. Hendrikson, address unknown
7. The following representatives of COR and/or DetroitCOR may be called:
- a. Frank Burejsza, address unknown
  - b. Jefferson Seaver, address unknown
  - c. Jennifer Beahan, address unknown
  - d. Fred Edwards, address unknown
  - e. Jende Huang, address unknown
8. Other employees, representatives, and/or custodians of the records from each of the following may be called:
- a. American Freedom Defense Initiative and related entities
  - b. Suburban Mobility Authority for Regional Transportation
  - c. CBS Outdoors
  - d. Jihad Watch
  - e. Atlas Shrugs
  - f. AFDI.US
  - g. Stop the Islamization of America- SIOA.org, SIOAonline.com
  - h. Refuge from Islam – Refugefromislam.com
  - i. Stop the Islamization of Nations – SION.org
  - j. Truth About Muhammad – Truthaboutmuhammad.com
  - k. MyJihad.US
  - l. TruthAboutQuran.org
  - m. LeaveIslamSafely.com
  - n. DefendingReligiousFreedom.us
  - o. Facebook
  - p. Twitter
  - q. David Horowitz Freedom Center
  - r. Virginia Anti-Shariah Task Force
  - s. Miami Dade (Florida) Transit
  - t. Washington Metropolitan Area Transit Authority
  - u. Metropolitan Transportation Authority (New York)
  - v. Chicago (Illinois) Transit Authority
  - w. Internal Revenue Service
  - x. DetroitCOR and/or COR
9. Defendants reserve the right to call any and all witnesses listed on Plaintiff's Witness List, whether or not called by the Plaintiff at trial.

10. Defendants reserve the right to call any and all witnesses listed by other parties, whether or not called by that party at trial.
11. Defendants reserve the right to call any and all necessary rebuttal witnesses.
12. Any and all witnesses listed in Interrogatory Answers, Answers to Requests to Produce, Answers to Requests to Admit, Depositions, and/or other discovery and pleadings.
13. Any and all witnesses named in discovery.
14. Defendants reserve the right to amend its witness list to add additional witnesses as they become known through the course of discovery.
15. Defendants reserve the right to name additional witnesses including expert witnesses on the topics of the political nature of Plaintiff's advertisement and/or constitutional law.

VANDEVEER GARZIA, P.C.

By: /s/ Christian E. Hildebrandt  
CHRISTIAN E. HILDEBRANDT P46989  
Attorney for Hertel, Gibbons and SMART  
1450 W. Long Lake Rd., Ste. 100  
Troy, MI 48098-6330  
(248) 312-2800  
[childebrandt@vgpclaw.com](mailto:childebrandt@vgpclaw.com)

SUBURBAN MOBILITY AUTHORITY FOR  
REGIONAL TRANSPORTATION

By: /s/ Avery Gordon  
Avery E. Gordon (P41194)  
Anthony Chubb (P72608)  
Co-Counsel for Defendants SMART, Hertel  
and Gibbons  
535 Griswold Street, Suite 600  
Detroit, MI 48226  
(313) 223-2100  
[agordon@smartbus.org](mailto:agordon@smartbus.org)  
[achubb@smartbus.org](mailto:achubb@smartbus.org)

Dated: June 7, 2013

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause by the method(s) indicated below on June 7, 2013.

<input type="checkbox"/> U.S. Mail	<input type="checkbox"/> FAX
<input type="checkbox"/> Hand Delivered	<input type="checkbox"/> UPS
<input type="checkbox"/> Overnight Delivery Service	<input type="checkbox"/> E-Mail
<input checked="" type="checkbox"/> Electronic Notification Via the Court's CM/ECF System	

/s/ Andrea Gordon

ANDREA GORDON