

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SAINT LOUIS UNIVERSITY,)	
a Missouri benevolent corporation,)	
)	
Plaintiff,)	
)	Case No. 4:07-cv-01733-CEJ
)	
)	
AVIS MEYER,)	
)	
Defendant.)	
)	

DEFENDANT’S OBJECTIONS TO PLAINTIFF’S TRIAL EXHIBITS

COMES NOW Defendant Avis Meyer, by and through his undersigned counsel and in accordance with this Court’s Case Management Order dated February 7, 2008 (d/e 12), does hereby submit his Objections to Plaintiff’s Trial Exhibit List, as follows:

PLAINTIFF’S EXHIBIT	DESCRIPTION	OBJECTION ¹
1	Missouri Secretary of State Filing, enclosing Benevolent Corporation Charter of St. Louis University	
2	Missouri Secretary of State Filing, Registration of Fictitious Name for “St. Louis University”	
3	St. Louis University Internet Homepage	Relevancy; Foundation
4	Certified letter from F. Janoski to A. Meyer, dated June 22, 2007	Relevancy; Foundation
5	Letter from F. Janoski to A. Meyer dated August 16, 2007	Relevancy; Foundation
6	Letter from A. Meyer to Missouri Secretary of State dated August 21, 2007	
7	Certificate of Incorporation; Articles of Termination for a Nonprofit Corporation; Articles of Dissolution by Voluntary Action for a Nonprofit Corporation	

¹ Defendant reserves the right to further object to Plaintiff’s exhibits to the extent that they are not fully identified by Bates No. references and Defendant has not had an opportunity to review the actual documents.

8	Letter from F. Janoski to A. Meyer, dated August 30, 2007	
9	Articles of Incorporation and Certificate of Incorporation for The University News, a Student Voice Serving St. Louis University since 1921	
10	Articles of Termination for Nonprofit Corporation, Certificate of Termination	
11	Articles of Dissolution by Voluntary Action for a Nonprofit Corporation (file stamped); Letter from Missouri Secretary of State to A. Meyer, dated August 23, 2007	
12	Letter from F. Janoski to m. Moore and B. Gill dated October 11, 2007 enclosing Complaint	Relevancy; Foundation
13	Defendant's Answer and Affirmative Defense	
14	<i>St. Louis Magazine</i> article, dated August 2007	Relevancy; Foundation; Hearsay
15	Motion of St. Louis University Board of Trustees, dated June 13, 1998, amending Charter of <i>The University News</i>	Relevancy; Foundation
16	Charter of <i>The University News</i>	Relevancy; Foundation
17	<i>The University News</i> front page and editorial page dated October 2, 1931	Relevancy; Foundation; Hearsay
18	<i>The University News</i> May 4, 2007 edition	Relevancy; Foundation; Hearsay
19	Various editions of <i>The University News</i>	Relevancy; Foundation
20	<i>The University News</i> Internet Webpage	Relevancy; Foundation; Hearsay
21	Transcript, "St. Louis On the Air" Radio Program	Relevancy; Foundation; Hearsay
22	Email from SLU Office of the President to SLU students, faculty, and staff, dated March 14, 2008, "President's Monthly Message"	Relevancy; Foundation; Hearsay
23	Facebook postings re SLU v. Meyer dated November 24, 2007 to December 1, 2007	Relevancy; Foundation; Hearsay
24	Blog posted March 21, 2008, "Lawrence Biondi, S.J. gets drunk and writes a love letter to all his haters"	Relevancy; Foundation; Hearsay
25	Blog posted May 2, 2007, "media shit storm"	Relevancy; Foundation; Hearsay
26	Email from S. Sidak to J. Fowler, dated November 26, 2007	Relevancy; Foundation; Hearsay
27	Email from K. Lewis to K. Porterfield, cc: A.	Relevancy;

	Clifton dated May 4, 2007	Foundation; Hearsay
28	Email from A. Mayer to B. Supiano dated March 21, 2008, attaching draft Charter of <i>The University News</i>	Relevancy; Foundation; Hearsay
29	Email from R. Otto to J. Hunger, cc: D. Benanti, K. Porterfield, and J. Weixlmann, dated January 3, 2007	Relevancy; Foundation; Hearsay
30	St. Louis University Information Technology Appropriate Use Policy, effective July 1, 2005	Relevancy; Foundation
31	Missouri Secretary of State File, for “Martha’s Colonial Ice Cream and Candy Shoppe”	Relevancy; Foundation
31	Demonstrative Exhibits	Relevancy

Defendant reserves the right to assert additional grounds for objection depending upon the use of the exhibit at trial and any rulings of the Court.

Respectfully Submitted,

POLSTER, LIEDER, WOODRUFF &
LUCCHESI, L.C.

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2009, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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