

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

LARRY KLAYMAN

Plaintiff,

v.

HILLARY RODHAM CLINTON,

and

WILLIAM JEFFERSON CLINTON,

and

THE CLINTON FOUNDATION

a/k/a The William J. Clinton Foundation

a/k/a The Bill, Hillary & Chelsea Clinton Foundation

1271 Avenue of the Americas, 42nd Floor

New York, New York 10020

Service: Chairman Bruce Lindsey or Vice-Chairman

Chelsea Clinton Mezvinsky (née Chelsea Victoria Clinton)

Defendants.

Civil Action No.: 9:15-cv-80388

**EXPEDITED HEARING  
REQUESTED**

**(Week Of June 8 or  
June 15, 2015)**

**PLAINTIFF'S SECOND SUPPLEMENT TO REPLY OF  
NEWLY-DISCOVERED INFORMATION IN SUPPORT OF PLAINTIFF'S MOTION  
FOR THE COURT TO TAKE CUSTODY OF DEFENDANT HILLARY CLINTON'S  
COMPUTER EMAIL FILE SERVERS**

Plaintiff, Larry Klayman, hereby supplements his request for an expeditious hearing with regard to his motion for the Court to take into custody the email servers of Defendant Hillary Clinton.

As the attached pleading by the Department of State (Exhibit 1) admits, it has no documents generated by Mrs. Clinton concerning her having granted waivers to persons, companies, countries and other interests who are and were desirous of circumventing the

economic sanctions which had been imposed by Congress on the Islamic Republic of Iran to force this terrorist designated state into agreeing on an agreement preventing the development of nuclear weapons. As these sanctions and waivers were a principal responsibility of the Secretary of State Clinton, that no documents are claimed to exist is simply not credible.

The Department of State admitted:

Remand, at this time, however, is unwarranted. Unlike the previous *Freedom Watch* case (D.C. Cir. No. 14-5174), here the State Department found *no* responsive documents. It is therefore unlikely that any of the emails provided by former Secretary Clinton to the State Department are responsive to plaintiff's FOIA request. If no responsive documents exist, a remand to the district court would be entirely unnecessary, and this Court could proceed with this appeal.

See Exhibit 1 at p. 4.

This is why the Court is requested to immediately hold a hearing and take into its custody the email servers of Hillary Clinton, to preserve evidence before it is destroyed, as these email servers obviously contain the "missing" documents concerning her illegal sale of waivers to do business with Iran, as set forth and plead in the Amended Complaint and has been disclosed and verified by reputable investigative journalists. This was also set forth in Plaintiff's last supplement disclosing Swedish and Swiss interests donating money to the Clintons and their Foundation to obtain waivers.

WHEREFORE, Plaintiff respectfully requests an expedited hearing during the mid to later part of the week of June 8 or early during the following week.

Dated: June 4, 2015

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.

D.C. Bar No. 334581

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this June 4, 2015 a true and correct copy of the foregoing was served by the Court's ECF system, upon the following:

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/s/ Larry Klayman

Larry Klayman, Esq.