

**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

TRIAL BY JURY DEMANDED

**PLAINTIFF'S MOTION FOR PREJUDGMENT ATTACHMENT  
OF COMPUTER EMAIL FILE SERVER**

Plaintiff respectfully moves the Court for an order of prejudgment attachment of the computer file server (“server”) used by Hillary Clinton for sending and receiving electronic messages (“emails”), including through the email address (also known as a domain name) “@clintonemail.com,” including during her tenure as Secretary of State. Because of the *de minimis* disruption in the use of the server by duplicating an exact image in only a few hours to a day, perhaps overnight, Plaintiff requests that no bond be required to be posted for the

prejudgment attachment. In support of Plaintiff's motion, he files a corresponding Memorandum of Law setting forth the reasons and details for the motion.

Dated: April 9, 2015

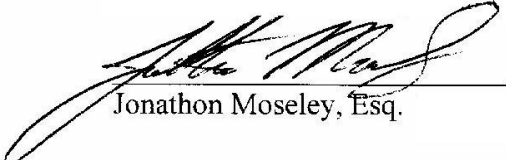
Respectfully submitted,

/s/ Larry Klayman  
Larry Klayman, Esq.  
Florida Bar No. 246220  
2775 NW 49th Ave, Suite 205-345  
Ocala, Florida 34483  
FREEDOM WATCH, INC.  
601 Pennsylvania Avenue, N.W.  
Washington, D.C. 20005  
Tel: 786-683-0269  
leklayman@bellsouth.net  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this April 9, 2015 a true and correct copy of the foregoing was served by first-class U.S. mail, postage prepaid, the Defendant having not yet entered an appearance on the Court's ECF system, upon the following:

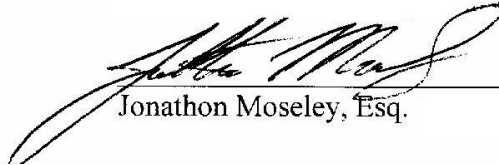
Mr. David E. Kendall, Esq.  
Williams & Connolly, LLP  
725 12th Street, NW  
Washington, DC 20005  
dkendall@wc.com

  
Jonathon Moseley, Esq.

Freedom Watch, Inc.  
2020 Pennsylvania Avenue N.W.  
Suite 345  
Washington, D.C. 20006  
(310) 595-0800  
leklayman@gmail.com

**CERTIFICATE OF COMPLIANCE**

I hereby certify that as a staff attorney for Larry Klayman at Freedom Watch, Inc., I contacted Mr. David E. Kendall at Williams & Connolly, LLC, mid-morning of April 9, 2015, by email to inquire if the Defendants consent or object to the motion or respond with other arrangements to resolve the dispute without the need for court action. As of 4:40 PM on April 9, 2015, I had received no response. I also am aware that David Kendall speaking publicly on behalf of the Defendants has already publicly refused and rejected the relief sought of independent examination of the computer file server in public statements in the news media.



Jonathon Moseley, Esq.

Freedom Watch, Inc.  
2020 Pennsylvania Avenue N.W.  
Suite 345  
Washington, D.C. 20006  
(310) 595-0800  
leklayman@gmail.com