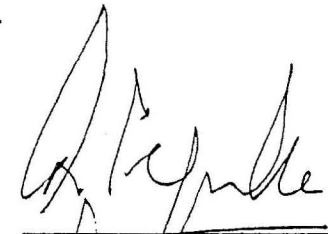


In The  
UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

GENERAL LEON DEGRELLE,	)	
Plaintiff	)	
	)	Civil Action No. CV 86-3767-RMT(Bx)
v	)	
	)	MOTION FOR
	)	PROTECTIVE ORDER
SIMON WIESENTHAL CENTRE,	)	
Defendant	)	

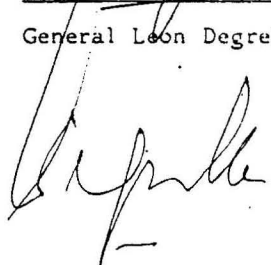
Comes the plaintiff in the above numbered cause, General Leon Degrelle, and moves this court for an order, under Rule 26(c) of the Federal Rules of Civil Procedure, deferring the taking of the plaintiff's oral deposition until ten (10) days prior to trial, or in the alternative for the deposition of the plaintiff on written interrogatories, and for a further order granting the undersigned such other and further relief as to this court may seem just and proper.

Dated:




---

General Leon Degrelle



In The  
UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

GENERAL LEON DEGRELLE	)	
	Plaintiff	) Civil Action No. 86-3767-RMT(Bx)
	)	)
v	)	)
	)	SUPPORTING AFFIDAVIT TO
	)	MOTION FOR PROTECTIVE ORDER
SIMON WIESENTHAL CENTER	)	
	Defendant	)

General Leon Degrelle, being duly sworn, deposes and says:

I am the plaintiff in the above numbered action.

This affidavit is submitted in support of a motion made pursuant to Rule 26(c), Federal Rules of Civil Procedure, for an order deferring the deposition of the plaintiff until ten (10) days prior to trial, or in the alternative for his deposition in written interrogatories.

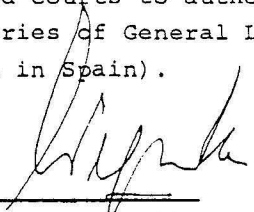
Plaintiff's reasons for asking for said deferral or deposition upon written interrogatories are as follows:

1. Defendant 's are well aware that plaintiff does not have the financial ressources to travel to Los Angeles at his own expenses at the present time. Unless the defendant's are willing to pay his round-trip plane fare, accomodation, personal protection (see next "3") and medical care required by his health condition (see next "4") and age (80), such a trip is an impossibility, for which there is no legal obligation.

2. The primary reason for the repeated scheduling of such "deposition" by the defendants appears to be primarely to annoy, embarrass, and oppress. Not once have the defendants furnished a statement as to why plaintiff must attend a deposition more than 150 miles away from his residence.

3. Defendants, judging from their reckless behavior, may have something in mind other than a mere deposition (see translations of newspaper articles).

4. It is extremely doubtful that, due to the plaintiff's poor health condition, such a 8,000 miles x 2 journey, with ten (10) hours time adjustment, be supported without irreparable - even possibly lethal consequences for the plaintiff (see 1985.medical detailed statement and medical certificate which caused the Madrid courts to authorise judicial deposition by written interrogatories of General Leon Degrelle, thence defendant in a court case in Spain).




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General Leon Degrelle

**FILED**  
MAR 20 1987  
CLERK, U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GENERAL LEON DEGRELLE, )  
 )  
Plaintiff, ) CASE NO. CV86-3767-RMT(Bx)  
 )  
v. ) ORDER REGARDING PLAINTIFF'S  
 ) MOTION FOR PROTECTIVE ORDER  
SIMON WIESENTHAL CENTER, )  
 )  
Defendant. )

Plaintiff moves for a protective order deferring the taking of his deposition until ten days before trial or, alternatively, providing that such deposition be taken upon written interrogatories in Spain.

This is an action for assault, false imprisonment, defamation, invasion of privacy, and RICO violations. Plaintiff requests a total of \$14,000,000.00 in damages. Plaintiff, who is now eighty years old and a Spanish citizen, was a Belgian Nazi general during World War II. He alleges essentially that defendant offered a million dollar reward for his kidnapping, leading to attempts to collect the award and a "nuisance" that forces plaintiff to be "careful merely in leaving his house," and that defendant has falsely labeled him a "war criminal." The

1 complaint was recently amended and defendant has not yet filed  
2 its answer.

3           Plaintiff twice failed to appear for noticed  
4 depositions. Following Judge Takasugi's order that, unless  
5 plaintiff obtain a protective order, he appear for deposition or  
6 suffer the entry of a default judgment, defendant renoticed  
7 plaintiff's deposition for April 2, 1987 in Los Angeles.

8           Plaintiff bases his motion for such a protective order  
9 on the grounds that (1) he cannot afford the expense of coming to  
10 Los Angeles, (2) his poor health makes such travel hazardous to  
11 him, (3) defendant's primary reason for repeatedly scheduling his  
12 deposition in Los Angeles is annoyance, embarrassment, and  
13 oppression, and (4) "[d]efendants, judging from their reckless  
14 behavior, may have something in mind other than mere deposition."  
15 Plaintiff supports his allegations of poor health with a February  
16 1984 physician's report and an April 1986 physician's  
17 certification that indicate plaintiff suffers coronary  
18 insufficiency with myocardic injuries and breathing insufficiency  
19 with bronchial spasm. The certification states that plaintiff  
20 must "presently totally rest at his domicile." According to  
21 plaintiff, defendant's "reckless behavior" is demonstrated by "the  
22 extraordinary concentration of international press publications  
23 . . . inciting violence against the plaintiff." Plaintiff  
24 appends to his papers examples of press accounts, which generally  
25 indicate that the funds originally dedicated to the capture of  
26 Josef Mengele will be offered for the capture of others, including  
27 plaintiff. Plaintiff offers no evidence of his lack of funds, but  
28 argues that he has no legal obligation to appear for deposition

1 unless defendant prepays his travel, accomodation, personal  
2 protection, and health care expenses.

3           Defendant argues that plaintiff has not shown the  
4 requisite good cause for the issuance of a protective order in  
5 that his medical condition apparently will not prevent his  
6 appearance in Los Angeles for trial and his assertions of  
7 financial hardship are conclusory. Defendant argues that  
8 plaintiff has not justified variance from the general rule that  
9 plaintiffs must appear for deposition in the forum they have  
10 selected. And, even if plaintiff has shown special  
11 circumstances, defendant urges its status as a charitable,  
12 nonprofit institution that depends entirely upon contributions as  
13 reason that plaintiff should bear the expense of appearing in Los  
14 Angeles.

15           Defendant opposes the suggestion that written  
16 interrogatories be substituted, arguing that it is well settled  
17 that the party seeking discovery choose the method. Defendant  
18 points out that proof of many of plaintiff's allegations will  
19 depend entirely upon plaintiff's own testimony. It also opposes  
20 the suggestion that oral deposition be deferred until ten days  
21 before trial, asserting that such a delay would be extremely  
22 prejudicial to defendant: testimony obtained so close to trial  
23 would not be usable as a basis for further discovery, Local Rule  
24 9.4.8 mandates completion of discovery at least twenty days  
25 before the Pre-Trial Conference, and a summary judgment motion  
26 must be made on twenty-one day's notice.

27           The Magistrate notes that oral deposition is a superior  
28 method of discovery, especially where, as here, the deponent's

1 testimony is crucial to the determination of factual issues and  
2 the deponent is likely to be a witness at trial. Plaintiff's  
3 allegations that his health prevents his traveling for deposition  
4 in Los Angeles and that he is somehow in danger from defendant in  
5 traveling here are not credible in view of his offer to appear  
6 for deposition here ten days before trial.

7 "The defendant has a right to take the plaintiff's  
8 deposition, and that right should not be conditioned upon  
9 advancing the plaintiff's expenses, except under unusual  
10 circumstances." 4 Moore's Federal Practice para. 26.77 at 26-496  
11 (1986). However, a party's preference for an oral deposition at  
12 the forum situs must be weighed both against his actual need for  
13 oral examination at that situs and against the resulting burden  
14 to his opponent. See Hyam v. American Export Lines, Inc., 213  
15 F.2d 221, 222 (2d Cir. 1954); de Dalmady v. Price Waterhouse &  
16 Co., 62 F.R.D. 157 (D.P.R. 1973). Thus, "[i]n order for this  
17 Court to appropriately and responsibly use its conferred  
18 discretion on the matter, it must be placed in a position to  
19 adequately and carefully weigh all the relevant facts." de  
20 Dalmady, 62 F.R.D. at 158. The Magistrate finds that the parties  
21 have not supplied him sufficient information to conduct such  
22 weighing.

23 Because his allegations of financial hardship are  
24 indeed conclusory, plaintiff is ordered to complete under oath  
25 before the appropriate officials in Spain the "Declaration in  
26 Support of Motion for a Protective Order," and to obtain from the  
27 appropriate officials at all financial institutions where he has  
28 accounts completed Certificates, which Declaration and

1 Certificates the Clerk of this Court shall provide him with a  
2 copy of this order. The completed Declaration and Certificates  
3 shall be filed in this Court by Thursday, April 30, 1987.  
4 Plaintiff may elect to submit to the Court by that date his  
5 physician's sworn declaration as to any medical treatment not  
6 presently required by plaintiff that plaintiff will need solely  
7 as a result of travel to Los Angeles.

8           Neither party has briefed the issue of whether oral  
9 deposition is possible in Spain. Defendant shall file by April  
10 30, 1987 papers on such possibility and/or the necessary letters  
11 rogatory procedure, specifically addressing whether the parties  
12 themselves may put questions to the deponent and the time  
13 involved. Defendant shall additionally brief whether its  
14 discovery needs can be met by written interrogatories that would  
15 be followed by oral deposition a few weeks prior to trial.  
16 Plaintiff may elect to file papers on these issues.

17           Defendant may elect to support its allegations as to  
18 its own financial status by declaration filed by April 30, 1987.

19           The notice of taking plaintiff's deposition on April 2,  
20 1987 is vacated. The parties shall bear their own costs.

21           DATED: March 20, 1987.

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27 VOLNEY V. BROWN, JR.  
28 United States Magistrate

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GENERAL LEON DEGRELLE, )  
Plaintiff, ) CASE NO. CV86-3767-RMT(Bx)  
 )  
v. ) DECLARATION IN SUPPORT  
 ) OF MOTION  
SIMON WIESENTHAL CENTER ) FOR PROTECTIVE ORDER  
Defendant. )  
\_\_\_\_\_ )

EXHIBIT A

I have been condemned by default in December 1944 by the "Tribunal Spécial" of Brussels (Belgium) - exclusively on political and military grounds - to death, forfeiture of any of my present and future assets, and to a fine of one hundred millions of Belgian francs (= US\$ 4 millions 1944 equivalent). From May 1945 till August 1946 I have been hospitalised freely at the General Hospital "MOLA", San Sebastian, Spain, for grave injuries. From August 1945 till 1959 I have been the free guest of the following Spanish persons: (1) the Count of Mayalde, Spanish Ambassador and Mayor of Madrid, at his castle of Bulgon (Toledo) and at his residence of Castanar (Segovia), (2) Mr Alfred Malou, industrialist, at his domicile, Bosquet street, Madrid, (3) the Countess Louise Narvaez de Valencia at her palace of Avila, (4) MM Gascon, industrialists, in their Estate of Majalismar (Constantina/Andalusia). After this 14 years period of time I have been rejoined by my relatives who are since then supporting me entirely, while physicians are freely providing their assistance.

May 4<sup>th</sup> 1977, Leon Degrelle de Rabizy, Ben



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DECLARATION OF SUSAN BURDEN

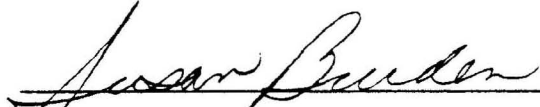
I, Susan Burden, hereby declare:

1. I am the Director of Administration and Treasurer of the Simon Wiesenthal Center.

2. The Simon Wiesenthal Center is a charitable, non-profit institution. It depends entirely on contributions for its existence.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8<sup>th</sup> day of May 1987 at Los Angeles, California.

  
SUSAN BURDEN

COPY

FILED

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CENTRAL DISTRICT OF CALIFORNIA  
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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GENERAL LEON DEGRELLE, )  
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 Plaintiff, )  
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 v. )  
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 SIMON WIESENTHAL CENTER, )  
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 Defendant. )  
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CASE NO. CV86-3767-RMT (Bx)

ORDER

Plaintiff has moved for a protective order, deferring the taking of his deposition until ten days before trial or, alternatively, providing that such deposition be taken upon written interrogatories in Spain, where he resides. The parties have timely responded to the Magistrate's order of March 20, 1987, directing the filing of certain additional statements and briefs. The motion is, therefore, ripe for adjudication without oral argument.

The motion is premised on two grounds: plaintiff's alleged medical condition and financial hardship. Insufficient evidence has been submitted to justify a protective order on

///

1 medical grounds. No reason has been advanced why, if plaintiff  
2 can journey to Los Angeles for trial, he cannot make an earlier  
3 trip to give his deposition. The only admissible evidence before  
4 the court, however, shows that plaintiff is relatively  
5 impecunious. He has stated under penalty of perjury that he is  
6 not employed, and that during the past twelve months he has  
7 received no money from employment, rents, interest, dividends,  
8 pensions, annuities or life insurance payments. He has averred  
9 further that in the preceding year he has received gifts from  
10 strangers of not more than \$500 and "pocket money never exceeding  
11 \$200.00 provided by my relatives." He has formally represented  
12 that he owns no real estate, stocks, bonds, notes, automobiles, or  
13 other valuable property (excluding ordinary household furnishings  
14 and clothing). It is true that plaintiff did not, as directed,  
15 provide "from the appropriate officials at all financial  
16 institutions where he has accounts completed certificates" as to  
17 his accounts, but given his representations as to the very limited  
18 funds available to him, he would not have significant, if any,  
19 accounts. In opposition, defendant makes only the merely  
20 conclusory statement, based upon press reports, that plaintiff  
21 "owns property both in Madrid and along the Costa del Sol, and has  
22 enjoyed a post-war life of considerable wealth and luxury." The  
23 only evidence before the Magistrate is that it would be a  
24 financial hardship for plaintiff to journey at his entire expense  
25 from Spain to Los Angeles for the sole purpose of being deposed.

26 As the magistrate observed earlier, oral deposition is a  
27 superior method of discovery, especially where, as here, the


28 / / /

1 deponent's testimony is crucial to the determination of factual  
2 issues and the deponent is likely to be a witness at trial.  
3 Interrogatories to plaintiff will not suffice, and it is uncertain  
4 at best and very complicated and expensive at worst, to attempt to  
5 depose plaintiff in Spain.

6           IT IS THEREFORE ORDERED, provided on or before June 19,  
7 1987, defendant shall have mailed to plaintiff a fully prepaid  
8 coach-class ticket for air travel on a regularly scheduled United  
9 States airline, Madrid, Spain to Los Angeles and return, that  
10 plaintiff shall present himself to be deposed for not more than  
11 twenty-four hours of actual questioning, for not more than six  
12 hours a day, at the office of Steven E. Zipperstein, Esquire, 700  
13 South Flower Street, Los Angeles, California, beginning at 9:30  
14 A.M. P.D.T. on August 17, 1987. If the aforesaid airline ticket  
15 shall have been timely provided, plaintiff's failure to report for  
16 his deposition as ordered shall subject him to the sanctions  
17 provided in Rule 37(b), F.R.Civ.P., including but not limited to  
18 judgment by default against him. If defendant ultimately  
19 prevails, the cost of the airline ticket shall be a taxable cost.

20           IT IS FURTHER ORDERED that the parties shall bear their  
21 own costs and fees in connection with this motion.

22           DATED: June 5, 1987.

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VOLNEY V. BROWN, JR.  
United States Magistrate

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LAW OFFICES OF MARTIN MENDELSON  
1700 K Street, N.W.  
Suite 1100  
Washington, D.C. 20006  
(202) 833-1893

FILED

1987 JUN 17 PM 3:20  
CLERK, U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
BY \_\_\_\_\_

LAURENCE M. BERMAN  
JEFFREY N. MAUSNER  
BERMAN & BLANCHARD  
1925 Century Park East  
Suite 1150  
Los Angeles, California 90067  
(213) 556-3011

HUFSTEDLER, MILLER, CARLSON & BEARDSLEY  
WARREN L. ETTINGER, P.C.  
STEVEN E. ZIPPERSTEIN  
700 South Flower Street  
16th Floor  
Los Angeles, California 90017-4286  
(213) 629-4200

Attorneys for Defendant  
Simon Wiesenthal Center

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GENERAL LEON DEGRELLE, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
SIMON WIESENTHAL CENTER, )  
 )  
Defendant. )  
\_\_\_\_\_ )

NO. CV 86 3767 RMT (Bx)  
NOTICE OF COMPLIANCE WITH  
ORDER RE DEPOSITION OF  
PLAINTIFF; DECLARATION OF  
BEE BARKSDALE

Pursuant to Magistrate Brown's order dated June 5, 1987,  
defendant Simon Wiesenthal Center has caused its travel agent to  
send to plaintiff a fully prepaid coach class ticket for air travel  
on a regularly scheduled United States airline (Trans World Air-

1 lines) from Madrid, Spain to Los Angeles and return, in order that  
2 plaintiff may appear in Los Angeles for his court-ordered deposition  
3 beginning at 9:30 a.m. on August 17, 1987.  
4

5 As set forth in the attached declaration of Bee Barksdale,  
6 the airline ticket was sent to plaintiff by express mail on  
7 June 10, 1987.  
8

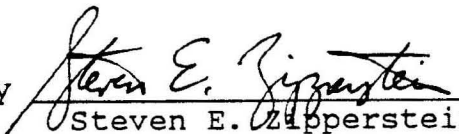
9 DATED: June 17, 1987

Respectfully submitted,

LAW OFFICES OF MARTIN MENDELSON

LAURENCE M. BERMAN  
JEFFREY N. MAUSNER  
BERMAN & BLANCHARD

HUFSTEDLER, MILLER, CARLSON  
& BEARDSLEY  
WARREN L. ETTINGER, P.C.  
STEVEN E. ZIPPERSTEIN

16  
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18 By   
19 Steven E. Zipperstein  
20 Attorneys for Defendant  
21 Simon Wiesenthal Center  
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DECLARATION OF BEE BARKSDALE

I, BEE BARKSDALE, declare:

1. I am a travel agent and an employee of Travelways, located at 470 South San Vicente Boulevard, Los Angeles, California 90048. I have personal knowledge of the facts stated in this declaration.

2. On June 9, 1987, at the request of the Simon Wiesenthal Center and its attorneys, I prepared and issued to Mr. Leon Degrelle a fully prepaid airline ticket for travel on Trans World Airlines from Madrid to Los Angeles and back to Madrid. On June 10, 1987, I sent the airline ticket and a computerized itinerary by express mail to Mr. Degrelle at his residence in Spain. Attached hereto as Exhibit A are true and correct copies of the airline ticket, the computerized itinerary, and the express mail receipt.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I executed this declaration on June 10, 1987, at Los Angeles, California.

  
\_\_\_\_\_  
BEE BARKSDALE

EXHIBIT A,

000083



ALIGN HERE

PASSENGER TICKET AND BAGGAGE CHECK SUBJECT TO CONDITIONS

CONJUNCTION TICKETS

7928:821:852

TRANS WORLD AIRLINES

ENDORSEMENTS/RESTRICTIONS/CARBON

REROUTING CANCELLATION SUBJECT

ARC AGENT COUPON

ORIGIN/DEST.

MAD/MAD

TRAVELWAYS

0 FEE

NOT TRANSFERABLE

09 JUN 87

ISSUED IN EXCHANGE FOR

LOS ANGELES

AGENT CPN

DEGRELLE/LEON

05 55992-3/TBRJPT

NOT GOOD FOR PASSAGE

CARRIER

FLIGHT

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DATE

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TAX XU 10.00

NO REFUND. ROUTING RESTRICTED AS TICKETED.

FORM OF PAYMENT

TP 1016 46584 001018 ABRAHAM COOPER

APPROVAL CODE - TOUR CODE

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470 South San Vicente Boulevard • Los Angeles, California 90048-4185  
(213) 653-3993 • (213) 652-7734 • Telex 67-4058 — Travelways LSA

SALES PERSON: 02  
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DATE: 09 JUN 87  
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TO: SIMON WIESENTHAL CENTER  
9760 W FICO BLVD  
LOS ANGELES, CA. 90035

Remit To: P.O. Box 481227  
Los Angeles, California 90048-9726

FOR: DEGRELLE/LEON

15 AUG 87 - SATURDAY					
AIR	LV MADRID	1140A	TRANS WORLD	FLT:903	SPCL COACH
	AR NYC KENNEDY	120P	NON-STOP	LUNCH	
AIR	LV NYC KENNEDY	400P	TRANS WORLD	FLT:815	COACH CLASS
	AR LOS ANGELES	635P	NON-STOP	DINNER	
22 AUG 87 - SATURDAY					
AIR	LV LOS ANGELES	1015A	TRANS WORLD	FLT:912	COACH CLASS
	AR NYC KENNEDY	630P	NON-STOP	LUNCH	
AIR	LV NYC KENNEDY	750P	TRANS WORLD	FLT:904	SPCL COACH
23 AUG 87 - SUNDAY					
	AR MADRID	845A	NON-STOP	DINNER	

AIR TICKET/S	TW7928821852	FOR DEGRELLE LEON	
		BILLED TO TP101646584001018	1,044.62*
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		SUB TOTAL	1,044.62
		LESS AMOUNT	1,044.62*
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		TOTAL AMOUNT	.00

IG-44

Please note: \$75.00 cancellation fee for this ticket.

# POST OFFICE TO ADDRESSEE EXPRESS MAIL NEXT DAY SERVICE



For Postal Use

<b>ORIGIN</b>	Date In: _____	Postage \$ _____
Post Office _____	Time In: A M _____ P M _____	Return Receipt Fee \$ _____
ZIP Code _____	Weight _____ lbs	
Initials of Receiving Clerk _____		
<input type="checkbox"/> Accepted for next day delivery.		
<b>ACCEPTANCE</b>		
<input type="checkbox"/> Accepted for this destination after deposit deadline for next day delivery therefore, for delivery by second day.		
(Consult your local Express Mail Next Day Service directory for deposit deadlines for different destinations.)		
<input type="checkbox"/> International On Demand		
Total Postage & Fees \$ _____		

**Account Number (if any)** \_\_\_\_\_ (Using an authorized number indicates postage and fees paid.)

Express Mail Corporate Account No. \_\_\_\_\_

Federal Agency Control No. \_\_\_\_\_

For Customer Use

**FROM:**

\_\_\_\_\_

**B**

**Service Guarantee:**  
 If this shipment is mailed at designated USPS Express Mail service facilities on or before the specified deposit time for next day delivery to the addressee, it will be delivered to the addressee on the following business day. Upon application by the mailer at the Express Mail facility, the USPS will refund the postage for this shipment if it is not delivered by 3:00 p.m. of the next day, or less delivery was attempted but could not be made or this shipment was delayed by strike or work stoppage. See Domestic Mail Manual Chapter 2 for details.

**Insurance Coverage:**  
 See section 254 of the Domestic Mail Manual for exclusions of coverage.

(1) **Merchandise Insurance:** Merchandise is insured against loss, damage or theft up to a maximum of \$500 indemnity, which will not be paid for spillage of perishable items.

(2) **Environment Reconstruction Insurance:** Non-durable documents are insured against loss, damage or theft up to \$500 per page, subject to a limit of \$1,000 per occurrence.

- Signature is required upon delivery.
- Claims for delay, loss, damage or theft must be made within 90 days. Claim forms may be obtained at the post office or mailing.
- THIS CUSTOMER RECEIPT MUST BE PRESENTED WHEN A CLAIM IS FILED.

## CUSTOMER RECEIPT

**TO:** \_\_\_\_\_ Telephone Number: \_\_\_\_\_

980-0

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing \_\_\_\_\_ and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am  an Officer  a partner \_\_\_\_\_  a \_\_\_\_\_ of \_\_\_\_\_

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for \_\_\_\_\_

a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on \_\_\_\_\_, 19\_\_\_\_, at \_\_\_\_\_ California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

\_\_\_\_\_  
Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT  
(other than summons and complaint)

Received copy of document described as \_\_\_\_\_

on \_\_\_\_\_, 19\_\_\_\_.

\_\_\_\_\_  
Signature

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of LOS ANGELES State of California.

I am over the age of 18 and not a party to the within action; my business address is: 700 South Flower Street, Suite 1600, Los Angeles, California 90017-4286

On June 17 19 87 I served the foregoing document described as NOTICE OF COMPLIANCE WITH ORDER RE DEPOSITION OF PLAINTIFF; DECLARATION OF BEE BARKSDALE

on \_\_\_\_\_ interested parties

in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at: Los Angeles, California

addressed as follows:

General Leon Degrelle  
37 Santa Engracia  
Madrid, 28010, SPAIN

AIR

(BY/MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee. Executed on June 19 87 at Los Angeles California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
SUSAN A. NARDACCI