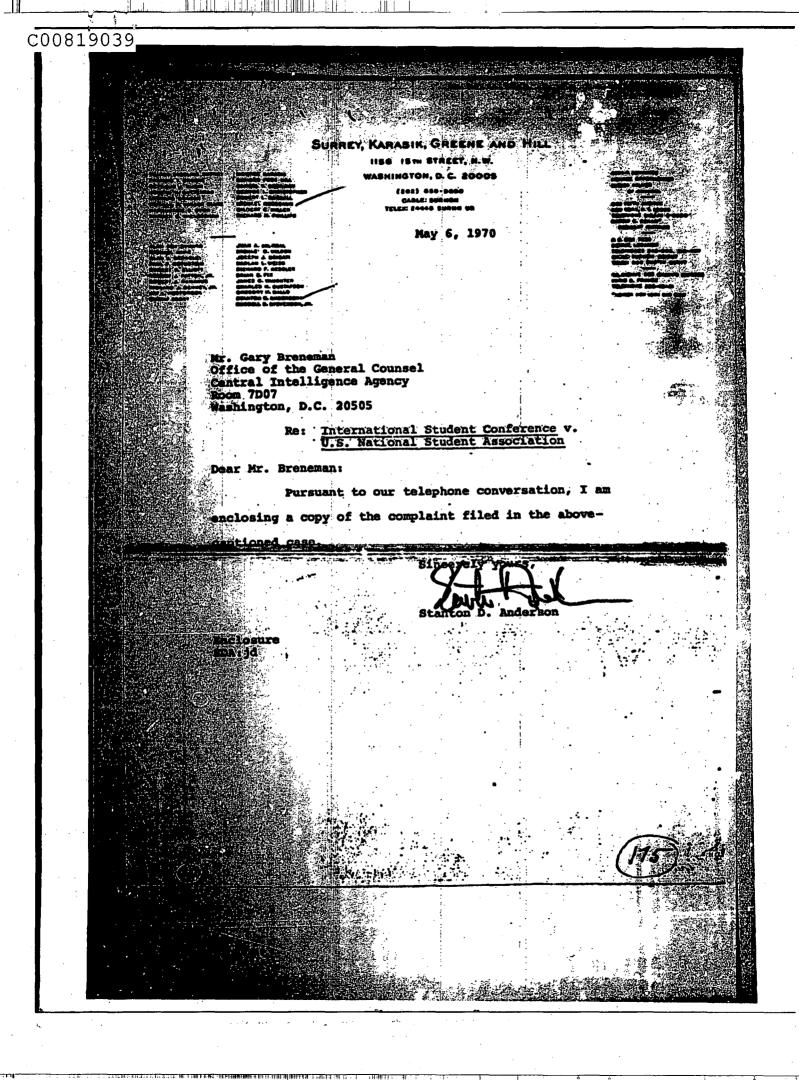
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C00819039 INTERNATIONAL STUDENT COMPERENCE Leiden, Notherlands

DISTRICT OF COLUMNIA COURT OF GRIERAL SESSIONS

Plaintiff

Civil Action No.

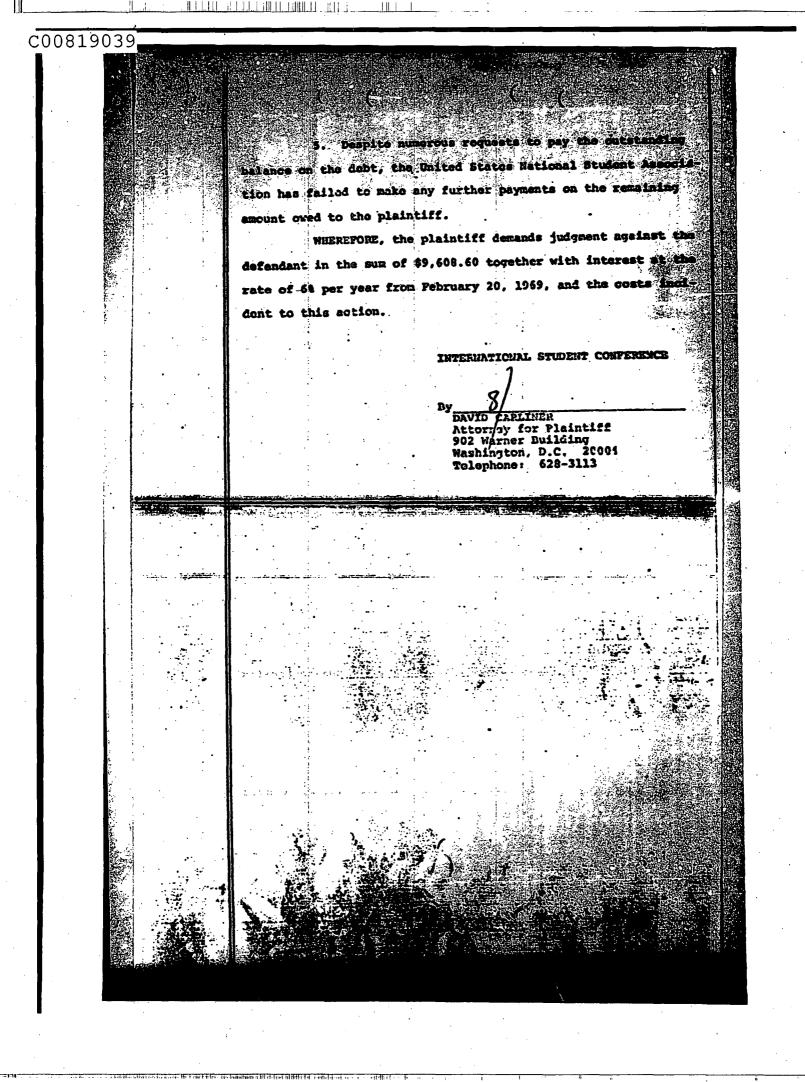
UNITED STATES NATIONAL STUDENT ASSOCIATION A District of Columbia Corporation 2115 S Street, N.W. Washington, D.C.

Defendant

COMPLAINT

(Action For Debt)

- 1. The plaintiff is an international organization
- andonartore, in Laiden. Natherlands
- Defendant is a corporation organized in the District of Columbia with headquarters at 2115 S Street, N.W.
- 3. Over a period of years the International Student Conference advanced funds on behalf of the United States Mational Student Association for travel grants to American students travelling abroad, for supporting various other activities of the United States National Student Association, and for technical assistance in various matters for the United States National Student Association.
- 4. In February 1967 the United States National Student Association was expelled from the International Student Confer ence. At the time of the expulsion the United States National Student Association was indebted to the International Student Conference in the sum of \$14,812,51. Between that date Pebruary 20, 1969 the United States Mational Student Association had made payments in various sums reducing the deck to the of \$9,608.60.



DISTRICT OF COLUMBIA COURT OF GENERAL SESSIONS

INTERNATIONAL STUDENT CONFERENCE,

Plaintiff

Civil Action No. 494-74

UNITED STATES NATIONAL STUDENT ASSOCIATION.

Defendant

THE RESERVE OF THE PERSON

OPPOSITION TO MOTION FOR EXTENSION
OF TIME IN WHICE TO OPPOSE PLAINTIPP'S
MOTION FOR SUMMARY JUDGMENT

Plaintiff opposes defendant's motion to extend time to file an opposition to plaintiff's motion for summary judgment, and as reason therefor states as follows:

by defendant in order to properly oppose plaintiff's ..motion is not presently in its possession, and that much of the information required is in the sole possession of the plaintiff', is in contradiction to a prior admission by the defendant through its counsel, Michael Mussbaum, Esq., of the firm, Surrey, Karasik, Greene and Hill, who stated on August 7, 1969 with regard to the claim by the plaintiff against the defendant as follows:

"I have today received the figures from MSA relating to the ISC debt. According to MSA, the net amount outstanding is \$10,040.58." See copy of letter dated August 7, 1969 from Michael Musebaum to David Carliner attached as Exhibit A.

tiff are largely irrelevant to the debt asserted by themptatesters

e.g., interrogatories 1. 2, 3, 4, 5 (a), (b), (c), 5 (a), (b), (c), (d), (e), (f), (g), 7(a), (b), (c), (d), and 8 (a), (b), (d) each relate to the structure and internal operations of the international Student Conference and appear to be dilatory as well as a quest for irrelevant information not bearing upon the existence of the debt to the plaintiff.

signment of the claim set forth in the complaint by the plaintiff bears upon an allegation set forth in the defendant's Answer at its "Fifth Defense", which states, "upon information and balled, defendant alleges that the claim set forth in the complaint has been assigned by plaintiff to person or persons unknown, who are the real parties in interest herein." The allegation on its face indicates that the defendant has "information" upon which this allegation is based. Such information, of course, could be set forth in a veriffet affiliavit instance.

4. The information sought in interrogatory 10 (a), (b), (c), (d) and (e), (ii), (iii), (iii), 11 (a), (b), (c), (d) and (e), 12 (a), (b), and (c) appears to be within the information alread available to the defendant in view of its express admission that it was indebted to the plaintiff as of August 7, 1959 in the sur of \$10,040.58, which is in excess of the sum claimed by the plaintiff.

Respectfully submitted,

BAVYD CANADIER
902 Warner Building
Washington, D.C. 20004
Accorded for Plainters

DISTRICT OF COLUMBIA COURT OF GENERAL SESSIONS

INTERNATIONAL STUDENT CONFERENCE,

Plaintiff

Civil Action No. 494-70

UNITED STATES NATIONAL STUDENT ASSOCIATION.

Defendant

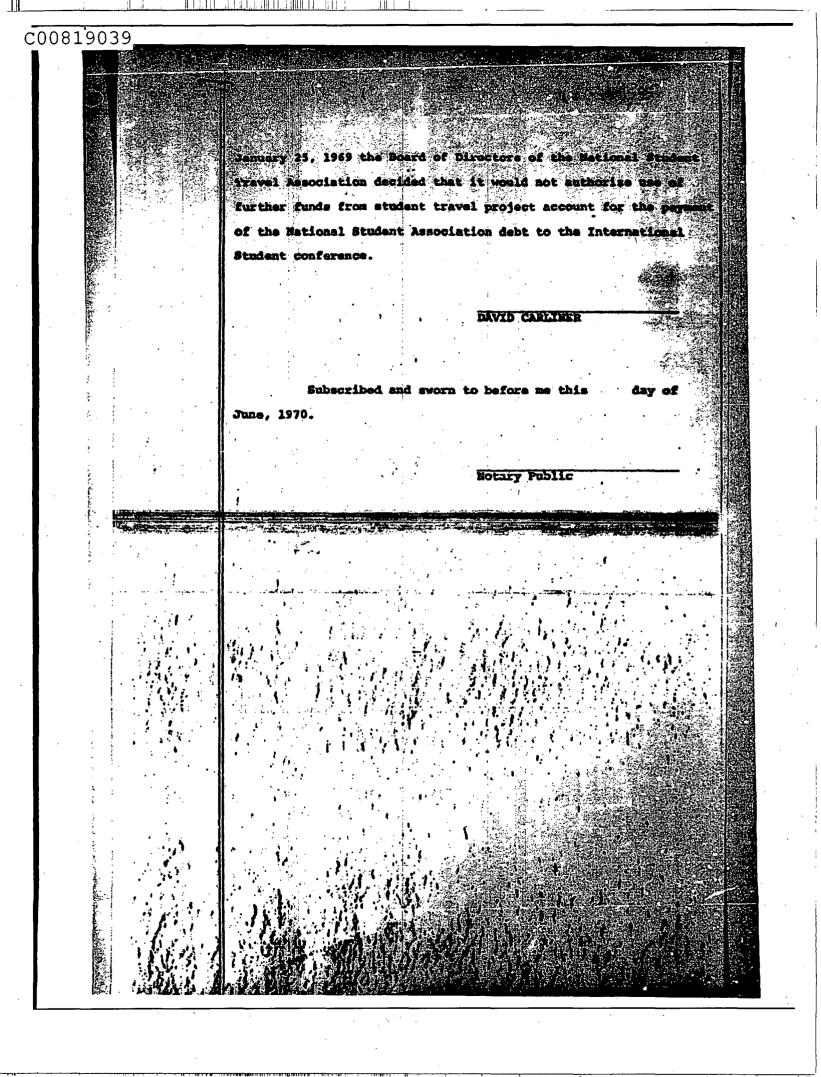
APPIDAVIT OF DAVID CARLINER

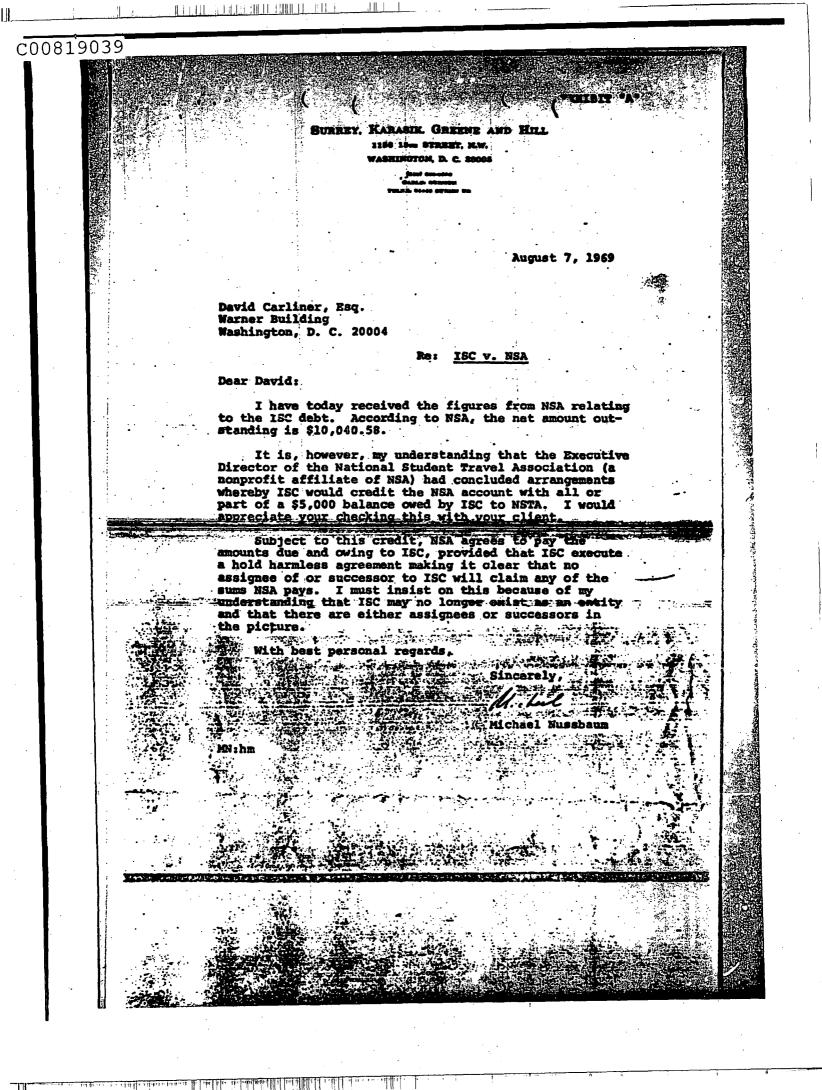
David Carliner being first duly sworm on oath according to law deposes and says:

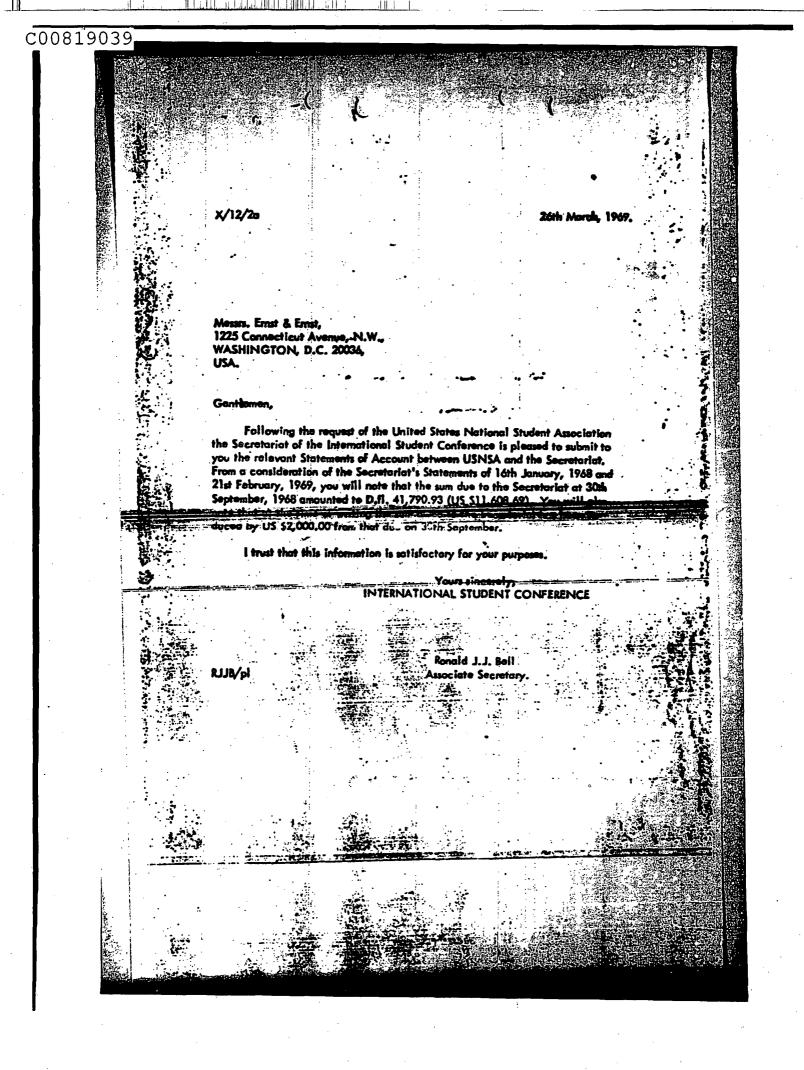
1. Upon information and belief, c. the accounting firm of Ernst & Ernst conducted an audit of the indebtedness owed by the United States National States Association to the Total

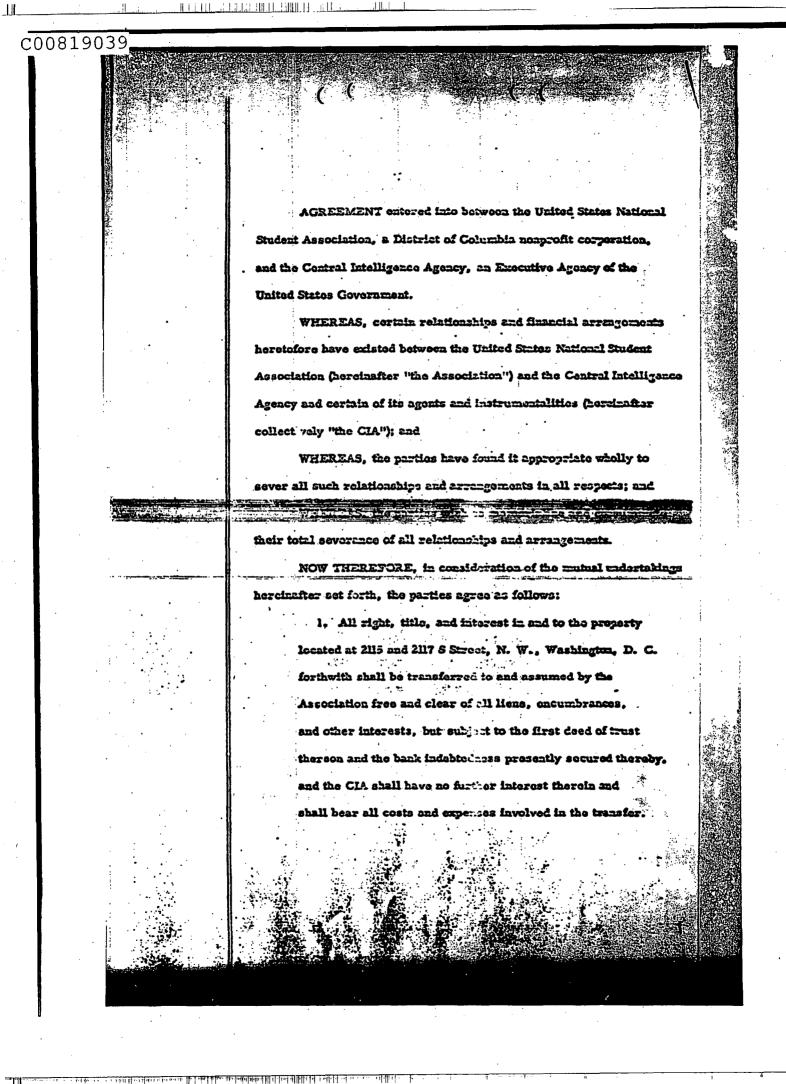
tional Studget Conference, and that mursuant to the request of Problem 2 Erect the International Student Conference substitted to the firm of Ernst & Ernst a full statement of account of the transactions between the defendant and the plaintiff on or about March 26, 1969 as appears from the attached correspondence, while the first first formal formal formal formal formal formal format format and the International Student Conference dated March 26, 1969.

- 2. On or about August 8, 1969 he received a letter from Michael Nussbaum, Esq. of the law firm, Surrey, Karasik, Greene and Hill, dated August 7, 1969, attached hereto.
- 3. The reference in the letter of August 7th to an understanding that the Executive Director of the National Stadent Travel Association (a nonprofit affiliat of MSA) had concluded arrangements whereby ISC would credit the MSA account with all or part of a \$5,000 balance owed by ISC to MSTATE, has not been asserted as an offset by the defendant in the present action Monethelese, upon information and ballet, affinition that the present action









C00819039 6. The Association's according of this agreement is oubject to its ratification by the Association's National Supervisory Board and National Student Congress. IN WITNESS WHEREOF the parties have signed this agreement this eleventh day of August 1957. United States national student association CENTRAL INTELLIGENCE AGENCY

ALENCE IN A CITE ACTION

DISTRICT OF COLUMBIA COURT OF GENERAL SESSIONS CIVIL DIVISION

Fourth Street between E and F Streets, N. W.

INTERNATIONAL STUDENT CONFERENCE Leiden, Netherlands

Plaintiff

Civil Action File No. GS4940-70

UNITED STATES NATIONAL STUDENT ASSOCIATION 2115 S Street, N.W. Washington, D.C.

Defendant and Third Party Plaintiff

ALIAS SUMMONS

CENTRAL INTELLIGENCE AGENCY Washington, D.C.

SERVE: General Counsel's Office Third Party Defendant COPY

To the above named Distributes Third Party Defendant; CENTRAL INVELLIGENCE - C. ...

The answer must be filed at the courthouse in Room 102 between 9:00 a.m. and 4:00 p.m. Mondaya through Friday or between 9:00 a.m. and 12:00 Noon on Saturdays, but not on Sundays or holidays. On or before the day you file your answer, a copy of it must be mailed to the attorney for the party plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, the answer must be mailed to the plaintiff at the address stated on this summons.

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR BEAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, contact one of the offices of the Legal Aid Society or the Neighborhood Legal Services for help or come to Room 102 of the courthouse for more information concerning places where you may ask for such help. Act premptly because your answer must be filed by the above date.

Day leal

Washington, D. Coddress 20005

JUN 1 6 1970

NOTE: This summons is issued pursuant to Rule 4 of the Court.

- BRING THIS SUMMONS WELL YOU AT

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TUTERUATIONAL STUDBAT CONFERENCE

Plaintiff,

VB.

) Civil Action No. 684949-70

The state of the s

UNITED STATES NATIONAL STUDENT ASSOCIATION.

Defendant and)
Third Party Plaintiff,)

WR.

CENTRAL INTELLIGENCE AGENCY, Washington, D.C.

Third Party Defendant,)

SERVE ONE COPY:
General Counsel's Office
Central Intelligence Agency
Washington, D.C.

THIRD PARTY COMPLAINT BY DEFENDANT
UNITED STATES NATIONAL STUDENT ASSOCIATION

1. Plaintiff INTERNATIONAL STUDENT CONFERENCE has file

And the second

dant to plaintiff in the amount of \$9,608.60; a copy of the Complaint is attached hereto as Exhibit A and is hereby incorporated by reference.

The second and the second and the second and the second second second

- 2. The Complaint alleges that defendant's debt arises from an advancement of funds made by plaintiff, over a period of years, on behalf of defendant for travel grants to American students traveling abroad, and for various other activities of defendant.
- 3. Assuming that such advancement of funds was in fact made by plaintiff, it was made for the sole benefit of the third party defendant CENTRAL INTELLIGENCE AGENCY (CIA).

BRING THIS SUMMONS WITH YOU AT ALL THES

En the evant that a Judgment is entered in this civil action against defendant United States Hational Studiest ASSOCIATION, then and in that event third party defendant CENTRAL CENTRAL STUDENT ASSOCIATION for indemnity or contribution toward satisfaction of said judgment.

Defende Surrey, KARASIK, GRZENE & HILL

COMPBy Juan A. del Red (Action Por Washington, D.C. 20005

1. The plaintiff is on force all Gall organization

ith F iquarters in ICERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Third will be Columbia with hard series of States National Student Cover a paried of years the Interrestical Student Association was mailed, postage prepaid, this 15th day of June, the restricted States National Student Association was mailed, postage prepaid, this 15th day of June, the restricted States National 1970, to David Carliner, Esquire, Attorney for Plaintiffs 202

Warner Building, Washington, D.C. 20004.

Tayolling Abroad, for separting waring other activities of the nited States National Sculent Association (1)

Saistance in various matters [Juan A. del Real National tudent Association.

In Pebruary 1987 the United States National Student sectiation was expelled from the International Student Confornace. At the time of the expulsion the United States National Student Association was indebted to the International Student onformal in the sum of \$14,812.51. **Between that date and abruar 10, 1969 the United States National Student Association as made payments in various sums restauring the debt to the sum of \$9,600.60.

BRING THIS SUMMONS WITH YOU AT ALL TIMES

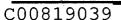
C00819039 GUNREY KARABIK GREENE AND HILL 1180 ISTH STREET, M. SHINGTON, D. C. 20008 (202) 450-5050 June 16, 1970 Civil Clerk D.C. Court of General Sessions 4th and E Streets, N.W. Washington, D.C. 20001 Re: International Student Conference vs. United States National Student Association Civil Action No. GS4940-70 Dear Sir: Enclosed herewith is the Affidavit of Charles P. Palmer, which as a result of an oversight was omitted from Defendant's Motion for Extension of Time in Which to Oppose Plaintiff's Motion for Summary Judgment. Purther, please note that Defendant's Motion for Extension of Time has a typographical error on the caption of the Please make the corrections on the caption of Defendant's Motion and attach the Affidavit to the aforesaid Motion. A complete set of the Motion, including Affidavit, has been served on David Carliner, Esquire, attorney for plaintiff. Sincerely Juan A. del Real JAdR/lrl Enclosures Subscribed to and sworn to before me this June, 1970.

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INTERNAT	IONAL S	TUDENT CO	NEERENCE			•	••,
	, ' ;	98.	• •	Plaintiff	, No	. GS4940	<u>-70 '**</u>
united s	TATES N	ATIONAL S	CUDENT_ASSO	CIATION,)		
		•	•	Defendant.	•		,
The Cler	k of said Co	urt will _ple(ase enter I	y appeara	CO AS A	ttorney	for
the_defe	ndant i	the abor	ve=caption	d_action.			
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whether this information is possessed directly by you, or by agents, employees, representatives, investigators, or, unless privileged, by your attorneys or their agents, employees, representatives, or investigators.

If any of these Interrogatories cannot be answered in full, you must answer to the extent possible, specifying the reasons for your inability to answer the remainder and stating whatever information, knowledge, or belief you do have concerning the unanswered portion.

- 1. Describe in detail the present legal composition of plaintiff.
- 2. Is the International Student Conference presently a partnership.



STATEMENT OF THE SUPERVISION COMMITTEE CONCERNING THE

Since its creation in 1952, the Supervision Committee of the International Student Conference has taken many decisions of major importance to the International student community. None, however, have been as serious as those which the Committee at its meetings held in Leiden between 9th - 14th February, 1969 has had to take. The Supervision Committee has decided:-

that it is not possible to convene the 13th Conference;

that it is not possible for the ISC to be maintained as a viable organisation;

to recommend to the member unions of the ISC that they should confirm by postal referendum that the ISC should be dissolved;

that the activities of the ISC Secretariat should be would up by 31st March, 1962:

that the activities of the ISC in the field of scholarship assistance and developmental aid should be continued by the International University Exchange Fund constituted as a separate and independent organisation.

the had not been the wish of the Supervision Committee that it should have the responsibility of taking these decisions which will have immense impact on the international student community. Under the circumstances, however, the Committee has not shirked from the responsibility of taking these decisions.

At its meeting held in Leiden in February, 1968, the Supervision Committee laid down the nature of the 13th Conference which it had wished the Secretariat to have organised. The Conference was to be open to all National Unions wishing to participate in the activities of the International Student Conference and was to be a forum at which the structure and activities of the ISC would have been reorientated to meeting the needs and aspirations of the international student community.

On the basis of the financial commitments made by the various National Unions and other fund somers, the ISC Secretariat announced in November, 1968 that the 13th Conference would take place in Salzhurg, Austria from February 18th - 27th, 1969. At the end of January, 1969 when the planning for the Conference was at a very advanced stage, the Secretariat learnt that a significant part of the funds committed for the Conference would not be available. The Secretariat re-examined the budget of the Conference and reduced it to its barest minimum, but there was still a deficit of about 59,000. Despite the strenuous efforts made by the Secretariat and help given by several National Unions, this deficit could not be covered. The estimated reduction in costs which could have been achieved by shortening the Conference was insufficient to cover this deficit. Accordingly, the Secretariat felt that it was impossible to go ahead with the plans for the Conference and decided to call an urgent meeting of the Suppression Committee to discuss the situation.

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"The ISC has now, since the Supervision Committee entered into full session in Leiden on 13 February, decided to cancel the holding of the 13th Conference. The Secretariat has issued a circular which has not yet reached us announcing the cancellation. The Supervision Committee has instructed the Secretariat to close down the Secretariat and has issued a circular letter to all member unions asking them to comment within three weeks on the proposal of the Supervision Committee to disolve the ISC."

"It appears that, from the legal point of view, the ISC can ask the Dutch authorities, who hold a register of all international organizations, to have its name removed from the register which means it thereafter no longer has any legal status. Normally we gather an organization simply becomes noribund and when this

of the register. We would prefer, and we feel sure that you would agree, that the Secretariat should take a positive step to have the ISC's name removed."

The Supervision Committee met on 9th February, 1969 in Leiden and decided that for financial and technical reasons it was not possible to hold the Conference as scheduled. During the lengthy discussions which followed, the Committee sought to find some arrangements which would have enabled the Conference to be held. Costs incurred in the preparation for the planned Conference in Salzburg further reduced the funds evailable and the Supervision Committee was of the opinion that any reduction of travel grants would have made the holding of the Conference a meaningless exercise. Faced with the undeniable reality of the Conference Fund, inadequate even to holding a Conference restricted to member unions and bearing in mind the wishes of many member argunisations for a very broad-based Conference, the Supervision Committee reluctantly came to the conclusion that no Conference could be held in the forseeable future. However, the Supervision Committee noted with gratitude the financial support of SFS, NSU, OH, PKPM, NUKS, DSF, SYL, NZUSA, NUAUS for the Conference.

As a consequence of this decision the Supervision Committee turned to the examination of the viability of the International Student Conference continuing to operate as an institution for international student co-operation. This in turn led the Committee to examine the changes that have taken place in the international student community over the past two years and the present trend of developments among National Unions of Students.

The puriod since the 12th International Student Conference that and student organizations throughout the world with not only the question of their education and their participation in it but also with the ills and inequities of the society in which they live. This trend has not been restricted to any one continent yet nowhere has the political change been as marked as in Europe. While the increase in the politicisation of students and their greater involvement in society is, in the opinion of the Supervision Committee, a generally welcome advance it is drawn to the conclusion that it is the political developments that have advanced in the European and North American student scene that are chiefly responsible for the International Student Conference being in the state it finds itself today. The politicisation of students in Asia, Africa and Latin America has also progressed. However, National Unions of Students in these areas have continued to value the work and political orientation of the ISC and the changes in their attitudes to the International Student Conference that have occurred have not been of the nature or degree that could have led to the present situation.

National Unions in Europe have been influenced in differing measure by the changing student mood and now at present it is not possible to create a consensus between those unions who over the years have traditionally found the international Student Conference to be the most appropriate vehicle for the international contacts and multilateral comperation.

The European Unions today are unable to agree on such fundamental issues as their approach to the purpose, functions ar even structure of the International Student Conference.

These unions can be divided into three rough groupings.

The first includes those unions whose policies emphasise the importance of the student as the vanguard in the struggle to completely restructure bourgeois society, and ballieve that because of its present nature, this change can only be brought about by revolutionary means.

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The second group comprises those unions whose membership also believes that students have a significant role to play in the reform of society and the alleviation of its ills, but whose approach is within the context of the present system, and who favour operating in the nature of political pressure groups.

The third group consists of those unions whose membership subscribes to a "student ex such" approach and whose interests and activities are thereby confined strictly to those matters which involve the interests of students in their capacity as students.

While the first radical group of National Unions is still a minority of the total, it has grown markedly in the past two years and the political trend in Europe is towards this pole. These unions, however, do not find it useful to engage in dialogue with other unions who do not share their approach to political questions and student unionism.

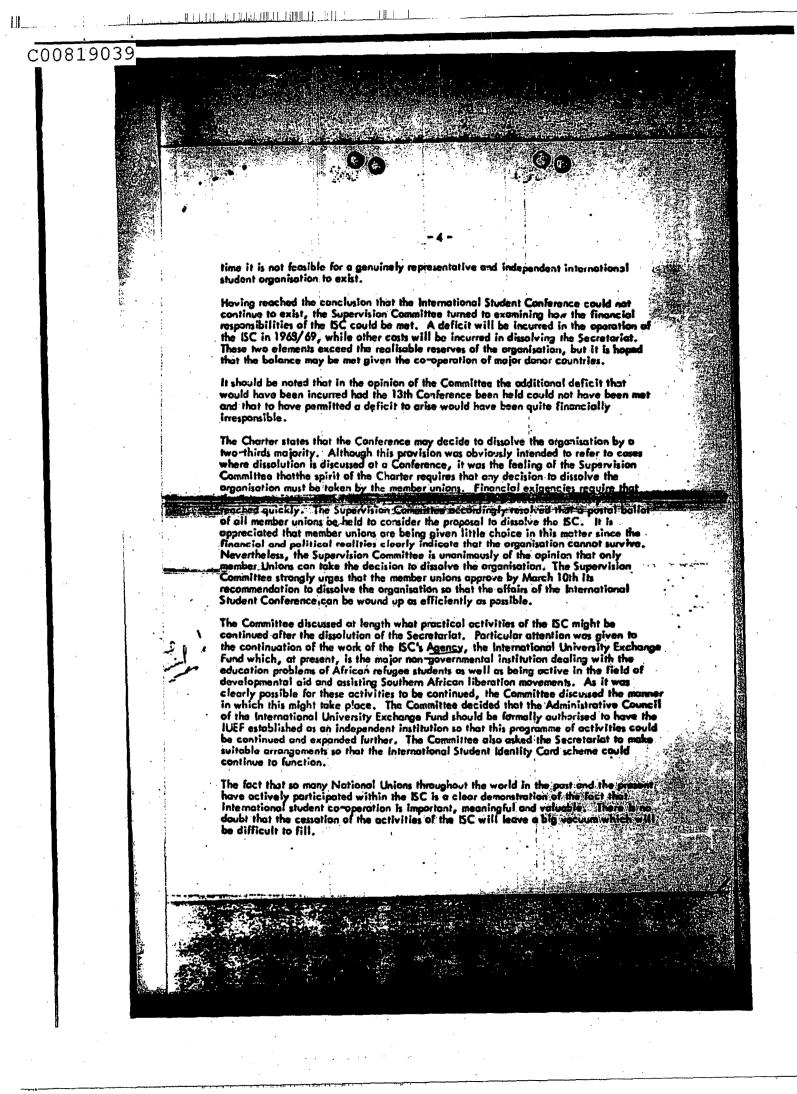
Even the larger middle group of "maderates" are unable to effect a meaningful dialogue Awith the more activist group. At the other end of the scale is the handful of unions who still subscribe to the archaic and outdated "students as such" concept and who thereby have isolated themselves from dialogue with either of the other two groups. This has resulted in a general breakdown in the consensus that once was possible amongst the European Mational Unions it has become impossible for the ISC to be universal and

As a result of the breakdown of the comensus among the ISC unions in Europe, the ISC can no longer have a broad and firm financial base.

It is an unfortunate fact of international student life that the finance for an organisation such as the international Student Conference, its administration and programme of activities must be raised with the help of unions in the developed countries, in Europe and North America. Unfortunately, a number of these unions who have the possibility of providing financial support to an organisation which can benefit in a real way unions in the less developed countries are often motivated by national considerations which are not infrequently at variance with the declared goals of the arganisation. No incident could exemplify more clearly the powerlessness of the majority of the unions in the ISC who came from developing countries, unions who are not in a position to provide the finance necessary for the operation of the arganisation, than the present situation.

In recent years, for finance, the ISC has been dependent on the support of a handful of wealthy National Unions, some of which have evinced little interest in the feelings of other members when they feel that the organisation has ceased to serve their often selfish ends. The situation reached the stage late last year-where one union, finding its views unacceptable, could by leaving the organisation and through its influence on financial sources, ensure that the organisation was ultimately forced to wind up its activities. The arrogance of power of rich countries in dealing with their less well-off counterparts is not uncommon in international organisations and the recent history of the international Student Conference provides striking examples of this trait.

On the basis of the financial evidence available, the Supervision Committee recognised that the International Student Conference could no longer operate with a minimum full-time Secretariat offering the present range of services for member unions or having one meaningful programme of activities, other than the IUEF activities. This realisation despite the fact that in recent years neither the Supervision Committee nor the Secretarian have spared any efforts in their search for funds, demonstrates clearly that at the search





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In the near future National Unions will have to give first priority to the establishment and development of bilateral, sub-regional and regional co-operation. This process will be slow and will not be easy but must be undertaken.

It is the belief of the Supervision Committee that genuine international student cooperation cannot be based on short-term self-interest, but rather should have as its
objective the promotion of student and general welfare by aiming to implement the
principles embodied in the United Nations Declaration of Human Rights. It rejects
suggestions that it is desirable or even possible to revert to isolationist policies in this
age of international inter-dependence. The benefits of international student
co-operation have been unequivocably demonstrated for all time and the future must
hold the hope of renewed and extended co-operation on some basis yet to be determined.

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