

Return to HW - copies in clothing, pencil, memo folders, etc

11/15/90- Jim, re: Wellford v Hardin-

175- 4, records: direct comparison in letters, emails so recently seen when mis-
filed in Archives in which archives gets SS to re-examine what they have written
about my requests. We should remember this for when in court or claiming suit.

176- seems to be a FOI specialist, figuring in other suits also. I think
in re v New, too, and Michaels'.

177 note this persistent dependence upon Tuchinsky, here said misplaced, as with us.

177 Tortara's first paragraph on Tuchinsky is sorta renumbering because of the
limitation it imposes on interpretation of significance, which is other than D's/

Did they not also cite the reversed Bristol-Myers on us?

178 The Bristol-Myers interpretation of law-enforcement exemption is very narrow,
bestowing it to only -emphasis- "premature discovery", i.e., not even discovery
where there is nothing before a court.

II (4) here is a parallel, in arguing before Cessell, to ask that all negotiations
on the letter agreement and memo transfer be produced in camera. here, in addition,
the Clark memo on what a plaintiff can know should be invoked.

179- no blanket on interagency relevant to Arch-SS corres; letter-agreement, memo
transfer arguments.

And, although it is under "interagency", there is this that is so relevant in
spectro, I'm surprised you didn't mark it:

"Purely scientific, factual reports and scientific studies cannot be
cloaked in secrecy by an exemption..." and here it goes into the intent of the
exemption, the real intent.