Paragraph 6 is more than casually deceptive in alleging what is irrelevant, having to do with ~~xxxxxxxxx~~"rights of privacy", the "degree of sensitivity (that)attaches to discussion of events and personalities", "the rights of persons discussed in the papers to be fully protected", "secure storage", "Indexing" (the latter two not the practise with this particular archive, lamentably in each case) and the alleged jeopardy to the willingness of prominent personages to donate their papers to the Archives, none of ~~which~~ these is here in issue. None are alleged to be relevant, but all ~~of which~~ are suggested as being relevant, whereas not a single one is. It is a polished ~~gem~~ gem for the hurrying eye, a clever deceit for the time-pressured mind, but utterly without ~~xxxxxxx~~point in this instant action. Notwithstanding the clever semantical exercise, defendants still again find it impossible not to concede that the purpose of such an archive is exactly that they deny plaintiff, "use". Nor is there, as is hinted, and question of "confidential restrictions" with regard to the evidence. The extreme to which this is carried is embodied in the argument that, "If this confidence is destroyed, the validity of the whole concept of the National Archives and Presidential Libraries will be placed in ~~jeopardy~~ question,..." This is to pretend the opposite of the fact, that the contract requires withholding, ~~xxxxxxxxxxxxxxxx~~ or the political overtone, that the family is responsible for the suppressions. The contract requires "access", and the defendants, refusing to honor these provisions, violate them and then say it is the doing of the family. The words here are smooth, seemingly reasonable but of incredible defamation of the living and the ones they lost.

Parargaph 7 embodies that ~~Hitlerian~~ authoritarian pose of the Archivist, that he has the right to decide for plaintiff or anyone else what his research should or should not be, should or should not include, what its purposes can and cannot be and the more incredible right, attributed to neither law nor regulation nor contract, to decide, not knowing what plaintiff's purposes or needs are, what is "adequate for research purposes". This is the concept of "research" and "adequacy" that prompted defendants and particularly the Archivist to give this Court a deliberately false, manufactured piece of evidence ~~showing~~ representing that the damage to the tie was in the center of the front of the knot, the same ~~manufacture~~ fabrication presented to the Warren Commission by those who represent defendants, whereas, to the knowledge of all, there was no ~~such~~ damage there. This is "adequate"? This is "research"? Nay, this is official

propaganda, a characterization not diminished by its misrepresentation as "evidence" to this Court, as if it was to the Commission that was thereby victimized by this ~~contrivance~~ fakery to hide reality, to make the false appear to be true.

With this action under the "Freedom of Information" act, can any concept of study, research, investigation or even "freedom" be more debased than by the assertion of the claim to the non-existing right of Government so to dominate and control what people may know? Only the hobnails are missing.

It is conspicuous that neither here nor anywhere else, in these instant papers or any other, in any alleged but non-existent index, is there any listing of even the existing pictures of this most basic evidence. Thus they are not listed to establish this "Vote ja!" assertion of "adequacy". With none of the ~~essential~~ photographs essential for any serious study of this evidence provided plaintiff by defendants and with their refusal to make those that are required, the absence of a listing of the "adequate" is ~~apparent~~ significant, as is the need to give this Court so contemptuous a display for its integrity and purposes as that deliberately-indistinct xeroxed fraud and deception labelled "FBI Exhibit 60."

The use of such language as "avoid" how any possible violation of the letter agreement" is a separate fraud, in the light of the actual meaning of the agreement, stripped of the ~~added and~~ deceptive added emphasis. "Access" is therein stipulated, as is photographing. But were this not the case, with the expressions by the family representative in Complaint Exhibit C, there is no such genuine official apprehension. This is political, not a contractual pleading, still another repetition of the phoney pretension that the family requires the suppression.

The libelous suggestion here, that plaintiff has "the purpose of satsifying personal curiosity rather than (for)research purposes", has already been exposed. ~~There~~ This is no honest interpretation of either the fine detail of plaintiff's descriptions of what he seeks and why ~~seeks~~ (a requirement not imposed upon him by the law or regulations) and his unending protest about the continuous forcing upon him of what served ~~no other~~ morbid purposes as a substitute for what he asked.

Nor is there in the minds of defendants any question about whether plaintiff is a "serious scholar or investigator". His public record is above question in this

regard. Defendants do not and have not raised this objection because they dare not. This is what reduces ~~them~~ defendants to nasty inuendos and libel, hardly evidence to a court of law and anything but the meeting of the "burden of proof".

So far is all of this evil suggesting and hinting removed from reality that plaintiff is constrained to add that not one of his specific requests is for a photograph of an entire ~~xxxxxxxx~~ item of apparel.

The rest of the innuendos in this paragrpah are contrary to the provisions of the contract. What ~~it~~ they in effect does is to argue that the contract makes impossible any kind of access. Defendants are thus in the strange position of simultaneously arguing that the contract they claim to be valid is invalid. Either way, they are lost.

Paragrpah 8 has other lies already exposed, ~~as~~ like the false pretense ~~that~~ "plaintiff" asked "to take his own photographs"

Paragrpah 9, again one of lies, ~~that,~~ being under oath and ~~relevant~~ material, ~~xxxxxxx~~ also, like those above, may be perjurious. ~~such as~~ One is, "plaintiff has never ~~asked~~ specifically requested permission to examine the above-mentioned articles of clothing," ~~is~~ has already been shown to be ~~lies~~ false, as is true ~~of~~ of what follows ~~it~~ in ~~the foregoing~~ that paragraph.

Thus all the long-denied attachments, falsely certified as immediately served upon plaintiff, denied after he requested them, can have a reason for this strange and irregular history of denial to plaintiff until after his second request, too late for them to be incorporated where they belong in plaintiff's presentation to this Court. Like all other attachments and quotations, these exhibits prove exactly the opposite of what they are claimed to show, where they are not false or irrelevant, and like everything else, their net effect it to validate plaintiff's Motion of Summary Judgement in his favor because they, too, prove that there is no genuine issue as to any material fact.

The truly pathetic plight of those who would subvert the law is that with even the immaterial, there remains no genuine issue as to any fact, and again it is as plaintiff represents and represented.

It is the combination of insatiable lust for suppression and legal bankruptcy that forces so mighty a Government into so demeaning a position and, as an alternative to compliance with law and its own regulations ~~imposes upon~~ submerges plaintiff and thereby this Court in an intolerable

torrent of the incompetent, irrelevant and immaterial after flooding both in a tide of misrepresention, deception, misquotation and outright falsehood, in the hope that plaintiff would drown therein and the Court be ~~dismayed at the manner, size~~ tempted to be unheeding because of the bulk of the papers so establishing.