

Dear Jim,

9/1/76

There will, in the future, be other uses we can make of what these crazy DJ people, well, maybe desperate more than crazy, have set up for me. When Shea questions whether I'm an investigator, whether I'm an expert, whether I'm an authority - should I give him a free book? Too, that is. Because I'm giving you something else to give him he'll like less.

It runs about 50 of my double-spaced pages. But if he wants to make an issue of what he calls special treatment, I think he needs some. Especially with the record and they have. And the other cases, where there can be the same kind of stonewalling.

It was really insane for him to make an issue of this. He has, and lacking any other way did it with slurs and inferences. I think maybe we will want to add one from Wrons.

I've made some changes in what I'd gone to make it more of a direct confrontation. It will be much more dramatic and much more effective because in combination all these false-swearing where can't stand. I've really tackled each and every one of them, directly, on fact, on knowledge, and on first-person knowledge. I've put at least one hat on each of them. There was no affidavit from Wiseman but I didn't forget him. Or Duggan, aka only AUSA/ Dugan.

I've worked in a little of what you wanted in the WFO file.

This one was, as I now recall, the first I did. Not for ego reasons, either. It is perhaps the best one on which to join issue. Note that I would not welcome the one I'd is now retyping, Shea and the lawyers.

I'll not be able to read and correct it today because someone is coming and is overdue. I'll start that in the early a.m., to permit more continuity.

We'll be playing to Green's need by giving her strength, exactly what the court of appeals want for, fact. I'm also addressing for you substantial questions of fact that she'll have to resolve. I've forgotten not a single one, either.

She'll have more options, more ~~strength~~ strength and if she really wants to, she can also strike a blow for all the abused and needlessly overworked judges. She will be in a position to make examples of these really terrible people.

They've filed their motion to stay to counter your motion for certification of compliance. So, that is the affidavit I'll be retyping first. In it I've handled all the lawyers together. One at a time, in the order of attachment to Dugan's motion.

This is going to require one thing of you: that you start compromising on perfection. This is overdue. You cripple yourself with it. Their game is to overload us. They can. They have. Unless we stop it they will continue to. So, especially now, when you really ought not exhaust yourself prior to full and complete recovery and recapture of strength and energy, I press a different standard on you: Is there any compelling reason why I can't file this as it is? Sure it can be better. But we are, I think, past where that ought be your first consideration. We don't want any error, any risks. But if I've forgotten something, we can add it. This time we have an unusual license: they've not responded to my 1969 King request yet! What an open door when their defense is contrived statistics!

So be thinking of a formulation under which you can present unedited affidavits. Green is receptive. We must, immediately, take the initiative and give ~~it~~ these wretches something to contend with, one and all. If they cannot, which I believe will be the case, or do not, which is another alternative, she is wide open and if we have nothing else we'll have a no-lose record.

hopefully,