Dear Jim, re attached re 1996 6/26/77

Last night's was my best and best-uninterrupted night's sleep since I returned.

There has been an abrupt remission of almost all the terrifying symptoms. Don't ask me why.

But I am extraordinarily weary, probably physically and emotionally both. Physically for sure. I can barely drag myself around. Not at all sleepy. Just bone. Otherwise sleepy.

I suppose it is a consequence of whatever it was that happened and my concern over it and the frustration of not even getting to talk to a doctor about it.

There were some interruptions, one a walk to Shockoton Road. I had to slow down long before getting there and walked back even slower.

So it gets disjointed. It varies in tense as I get carried away. But it says what I would like you to consider and what I think can now be helpful on Thursday.

If I pack up I'll go over the records I've duplicated for you and see if John can take them tomorrow.

So you'll know how weary I am today is the annual reunion of Lil's family. She decided not to go rather than have me drive her for less than a half-hour.

I want to be more alert when I annotate these recent records of which I've made extra copies for you to use in court. Two, one for the haunted one.

I've already made a separate file of the letters I've written Harringh. I will then go over them and make duplicate copies of all identified serials.

I've made one file of the replacement unsolicited- my first letter specified to John that after examining it he send or give it to you for the judge- and another of all those. Two separate files.

You make out my typos well enough so that I'll not read this in order to get the other things done before I receive the latest sections, probably Tuesday.

I'll include a carbon so you can cut one copy up and then use or rework as you will.

Now I want to address another matter. We are in a no-lose position. If the unlikely happens, and Green turns us down on all you have in mind and all I do we remain where we are. This is to say we cannot lose. We can only win. Frankly, impossible as I believe her rejections of all these requests is, even if she does that taking an initiative now, especially with hearings going on, will be helpful.

My belief is that confronted with what we now have and her record of letting them give me other than I requested combined with the new proof we have of the total accuracy of your allegations and my testimony as it relates to non-compliance she will not only move our way but she that it may react against her if she does not. Whether or not I am correct in this estimate I want to take that chance. My interceptions now are few.

I also want first compliance with my actual requests. My verbals enlargement has been accepted, I have offered to produce it, I have offered to put it in writing and was told by John this is not necessary. So I see no reason for there not to be other analysts assigned to these files of the Field Office files that do hold what has been withheld from me all these years. Pinpoint and forewarn here the Saintelyns, etc and actualities of the crime records, including all witness statements. There is no such things a s a witness statement not given in the expectation of public use. They are not immune in an historical case. A witness has no privacy on his testimony. Almost if not entirely without exception we have only FBI paraphrases.

I will not accept an arrangement that requires that I await whatever they describe as full compliance before there is a review and I will want something other than what we c can do nothing about on withholdings, some junk's frosm of what the sounding saint expects.

If I were 30 and in perfect health instead of 64 and in less than perfect health do you think there would be any circumstances under which go over between 1200 and 1500 inches of solid paper? This is what I'd now have to do to find any real use for any records they might at some distant date release, now withheld.

I not only want a working index but I want something attended to so that if I am again confronted with the utterly baseless claims I have faced to now there will be an expert who can be held to account. They have done all these dirty things in total immunity.

I don't care if there is a provision of the Act or of regulations or anything else that entitles the judge to rule against us or does not entitle her to rule for us. She has tolerated all these abuses for all this time, my time, has done nothing when I produced proof of the age of this request, has done nothing when I made a record of unjustified and unjustifiable withholdings and I'm not going to have the Gobles and the Blackburns and the [illegible] of the Bureau mind be [illegible] in all sorts of sanctions, arbitrary and contradictory withholdings and have no review after them of whatever his [illegible] wants them has sworn to this court and told the Congress. Losing is to lose nothing. Losing on this leaves us where we are. Winning on it now or later on appeal advances and strengthens the law, if it is not of immediate help to us.

Let her decide against us if she is going to. But begin to require her to make decisions. Otherwise there is no end. As you may remember hearing before. And as by now I believe the records show.

Separate from how you will prove them and from the issues you intend raising at the 6/30 calendar call I have some ~~XXX~~ suggestions of issues I would like raised. I would suggest that you have them ready and ready them and say you are doing it at my request, with a subsequent offer of proof at an evidentiary hearing if Dugan denies them.

I would prefer that you do it in terms of deliberate law violation by officials, which the judge may not like. And by citation of the record we have already made without any refutation.

Although the government has claimed that it has no record of my client's 1969 requests for the public information only now being delivered -in part and selectively - we not have proof that there was a decision to violate the law on the highest levels of the FBI. With the records reporting this decision not by themselves being from the Assistant Director Rosen to the Assistant to the Director DeLoach it would appear that Director Hoover made the decision that all others followed blindly.

We have alleged and I believe we have proved that the Department and the FBI have singled my client out for special attention that includes repeating, continuing and deliberate violation of his rights under the FOIA and PA Acts. His testimony of last September was not challenged then and has not been refuted since. He testified to and we produced evidence of about 25 FOIA/PA cases all long over even interms of the claimed backlogue. In the ensuing nine months my client has received but a single record from the FBI in response to all these requests - one already made available long before that time by the National Archives.

Although we produced evidence that my clients request for the reports and pictures of an Army intelligence agent who happened to be at the scene of the JFK assassination have never been responded to since about 1968 and that several years ago some of this was given by the FBI to another, to this date even this simple request has not been complied with. Although my client's check was cashed.

On the other end there is my client's long-standing requests of not only these defendants but of all relevant agencies for their files on him These not go back more than six years, even to the period when my client did not have the protection of the Privacy Act. With the FBI, although it has denied it, my clients first request was about a year old when he testified last September and when we put into the record proof of discrimination from the records of the providing to Les Whitten of the records on himself requested during the same time period. None month have elsapsed. Only last week was I told that the records are being compiled. There are an admitted four volumes. My client's belief is that there should be more. While this is also a reflection of defendant's special interest in my client, out last year's undenied allegation, and it is a proof of deliberate discrimination which is a violation of law, it also provide motive for what need not and should hat have happened in this litigation, litigation that should not have been needed, for the resultation imposition on this Court and on my client and me and through them my client the people to whom he is ~~about~~ giving all his records through a university system. (His second deposit of less than two months ago was ove nine full file drawers.)

Going along with this deliberate, pllaned, officially ordered and unquestioningly executed ~~this~~ violation of the law to my client's detriment and through him to the dertiment of the people in whose interest the law was enacted the defendants ~~combined~~ ~~among themselves~~ representatives combined among themselves to contrive the heavily-promoted works of sycophancy that have been commonplace in this field. Their two pereferences were Herold Frank and Jim Bishop, Mr. Bishop despite the fact they considered him pompous, both of whom did write works of sycophancy and both of whom credi the FBI for its help.

CHEDK TO BE SURE OF BOTH AND INCLUD BLAIR.

In short, while deliberately violating the law to deny my client his rights the defendants undertook to bestow selections to defendants liking from the identical files to those who had nor requested these records under FOIA,

and surgery

Last year, although impeded by my illness/in Singapore my client did allege under oath and subject to the penalties of false swearing that the affidavits provided the court in the case by defendant are falsely sworn. My client was subject to cross-examination on this. Defendant's counsel declined this cross examination when my client was on the stand and when this court offered it at a later date, as my client also did.

Since then no single one of these affiants has retracted his false swearing. No single one has relieved it. No single on has supplied so much as a single record in what might be called token atonement.

We are now prepared to prove to this court all over again that each and every one of ~~all~~ defendant's affiants misled this court whether or not any one skirted actual perjury. We have records from every one of these Divisions which denied having any records of which denied having records other than these supplied by it. Moreover, we have records from other division that did not respond, as my client stated they should have responded.

While we believe there are other reasons and are prepared, this Court so desiring, to offer proofs, there is a central theme in all of this; deliverate violation of the law and deliberate denial of my client's rights under both Acts.

Another motive also is apparent. There was a deliberate, permeating and never ending denial of James Earl Ray's basic legal and constotution rights from the moment of his arrest and we have no reason not continuing today. One of the withholdings in this current matter is, quite clearly, an interception of communications in Mr. Ray's efforts to obtain counsel while he was in England. This defendant possed details of his efforts in his own defense from the time they delivered him to Memphis, including intercepttions and copyings of his letters to his lawyers and their response to him. This continued even after the trial judge ruled this to be wrongful and illegal. We have copies of these intercepted communications.

Going along with these and what my client regards as other and basic abuses of American law and principles is what he regards a s a combination of deliberate devices to frustrate who compliance was promised and proceeded with when this court issued no contrary order.

To begin with a vast Rube Goldbergian machine for complicating and delaying response to my clients requests was structured. It began with defendant's counsel misrepresentation that there could be full compliance from the FBI HQ file. Then it was extended to providing all of that file to my client. He now welcomes it and is depositing all of it in the university archive. However, most of it does not relate to his requests. The time consumed in giving my client what he did not ask for not only has delayed and continues to delay- AFTER NINE YEARS- what he did ask for.

To assure there would be disputes and non-copliance guised as full compliance, of the perhaps 4,000 FBI agents who had some personal knowledge of this investigation not one has been assigned to compliance.

It can be assumed and it is fact that for reasons ranking from what my client has often enough told the FBI is due diligence in protecting the rights of other to the most incredible stonewalling there has been an unended serials of what by now are countless thousands of withholdings from thousands and thousands of pages. This include the most publicized of names, countless elected public officials, convicted felons whose names are withheld as.actively, no end of what appeared in newspapers and magazine and books.

What my own client published years ago is not held to be immune under exemption b(7) if not also other exemptions.

Transcripts of public trials and hearings are now - and not for the first time- described as investigator files. In one such case of which I was informed only last week in a related case I was actuall told that the transcripts of the evidentiary hearing held in Memphis in October 1974, a hearing for which my client did the investigating and I did most of the questioning, is part of an investigatory file and thus denied. The witnesses whose testimony-covered and reported by all the major media - include the plaintiff and ~~counsel~~ his two bothers.

And by whom? In the office of the Deputy Attorney General, the office of appeals and of supervision of "compliance, by the head of the subordinate office to which the investogations into professional responsibility are entrusted.

Here he judges himself- and certifies the public record is within the exemption. It is he who was in charre of t e fourth "epartmental re-investigation of itself.

What is now being delivered to my client in this instant case Michael Shaheen now tells my client's lawyer must be kept secret despite his acknowledgement of the open guidelines stated by the new Attorney General.

There now is do doubt that he had physical possession of records not provided to my client. He simply swore that tne law does not apply yo him. And held onto the records so other components could not comply in the remote event they might have been tempted to.

As an example of the extremity to which defendants have gone to withhold what is public and were it not is not exempt there is a newspaper story in which on all occasions one name is blacked out on the claim of privacy! It is the name of the one live witness when James Earl Ray was extradicted. The name of George Bonebrake then and on the countless occasion on which he was an expert witness is what is blacked out in this newspaper story.

Well known public and police officials whose names have never been made secret, even in accounts of their press conferences.

Aliases of convicted felons are withheld under the claim to privacy. All these names are publicly known. Where the names are not withheld aliases are. These are all matters of court and public record.

The names of subpoenaed witneses have been withheld although their names and addresses are available in the court record and have been published internationally.

On many occasions my client has written many letters calling such wrongs to official attention. His letters to the Director remain with out answer and they go back to last year. His letters to these working on compliance likewise never receive written response. Almost without except my clients specification of improper withholdings remains undenied.

When it became apparent that the respondents were not going to comply with the language of the law and ere going to perpetuate what we regard as a long history of stonewalling; when it was obvious t at the statements of this Court meant nothing to respondent's agents, my client, in an effort to ease the work and assure compliance, offered indexes to all published work. My client has had index made of the guilty-pleasx hearing and of the two weeks of evidentiary hearings. Both have been declined. My client actually statred having all the indexes of all indexed books concolidated into a single card file. He offered this and was told it was unnecessary, that the analysts had all the book, incldding my client's, and were using them. From tha, time last year to now there has be n systematic withholding of material and names that have been public for years and are itemized in these indexes. With regard to what my client has published this continues to the present/.

The whipsawing never ends. Although it is now beyond question that my client's requests are or nine yearsago and this to respondent's knowledge, respondent has imposed and then not adhered to arbitrary alleged sequential procedures. My clients has proven the claims made to this court in this regard to be false. Nonetess, after seven years respondent supposedly complied with what was the April 1975 request. My client proved this to be falsely sworn. There has been no reliving of this false swearing before this court and no releif to my client from it. The basis for this affirmation is sworn to be the very file from which my client has been receiving records. This court was assured there were no pictures of the scene of the crime. We have proven that not fewer than three sets were to our knowledge within that identical file. Under the supposed second request now a year and a half old althought is was a specific request eight years ago we have been given colies of one misidentified set. At least one other such set is in respondents possession, has not been mentioned to this Court and has not been produced. This does not take into account still others known to exist, those we believe are still kept in the field offices.

This court was assured under oath by SA Wiseman and also by AUSA Dugan that there

never were any other suspects, This is untrue. In the same file SA Wiseman swore to having searched there is a single record that notes a total of 400 other suspects were recorded before James Earl Ray was ~~identified as a suspect~~ named. Later there were many more.

Compounded by unfaithful representations to this Court there has been an elaborate charade of compliance that remains non-compliance. When this Court did not direct otherwise once respondents offered other than compliance my client felt he had no choice but to accept and hope there was other than what he then suspected, more stonewalling, as he informed this Court last year, with those records he has received further validating his statements that then and since have not been challenged.

When it was apparent that respondents were going to have to provide some records they selected those files least likely to contain what my client has sought all these years. My clients specification of other files in which the records most important to him are stored was ignored.

Nonetheless my client assures me there are other and considerable values in these records he has obtained. He has for this reason preserved them exactly as he has received them. They are all going to the university system that will receive all his records. My client's description of them is of a monument to a non-investigation. The volume is such that few writers will be able to take the time to begin to extract what is in them. My client has taken this exhausting time and has prepared some guides for scholars of the future. He has found a who methodology of substitution for criminal investigation that nonetheless represents in some aspects commendably dedication to detail.

My client assures that in this verbal enormity holds few secrets. For the most part these few are sources my client is not certain he can identify. He has urged me that the names of FBI agents already in the record in this instant case continue to be withheld, so establishing how much is secret is not easy and cannot be certain. Where it is relevant to the crime itself these are virtually nil.

Even as applied to FBI agents. Anyone wanting to learn their names would be more likely to consult newspapers than a university archive of the magnitude of this own.

There are very few FBI agents whose identity as FBI agents is not known.

With regard to these my client's requests that the withholdings be terminated are entirely limited to where there is historical significance and where they may be essential to discovery, which would be limited to establishing the existence or non-existence of what is germane to his request, not the frequent revisions of it by respondents.

My client has gone to what for him is considerable trouble and cost to preserve all the records that for him are original records, those supplied by respondents. In all case he has provided me with duplicates he has paid for as that the records given him may go to the archive he has established.

When there is unnecessary withholding/~~[illegible]~~ there is an Orwellian treatment of history we believe to be foreign to the language and intent of the Act.

But there must be a distinction between what is legitimately withheld under such entirely proper standards as ~~[illegible]~~ "unwarranted invasion of personal privacy and what in an overwhelming majority of the thousands of instances is not even private, whether or not unwarranted.

It is based upon repeated assurances of reform and change that at the last status call my client asked me to raise no issues of this and similar nature. He has since learned that this meant the withholding of what had not been witheld earlier. Another reward for his patience after all these years was the delivery of completely incomprehensible and needlessly indictinct worksheets the only means of checking both the records delivered and the possible legitimacy of the claims to exemptions. Once my client directed me to take the official word factual errors appeared in these worksheets. When he lost patience and retrned indistinct worksheets- and these are copied from original records - they were replaced with others still not clear. He has them with him today, those that were replaced and all subsequent ones, the copies provided him, not copies he mac. If respondents question his representation they are available for the Court's own examination.

This is an area in which my client has professional expertise. If the smallest in the country my client is also a publisher. He and he alone prepares his books for printing. he is confident that he can testify to an easiesr, faster and cheaper means of providing

blank memoranda that permit them to hold more information and more legible information. Those word have been so conceived that one of the analysts working on this case has ststematically omitted dates that are essential to mean. There is no space for him to write them in legibly.

Moreover my client is so confident of this he is here and now willing to go to a Washington commercial arists, have the draft prepared in little more than a few minutes and then have it produced in a backyard rural printing plant where he lives. This represents enormously less than the capability of the tax-financed FBI whose facilities are and should be modern and elaborate.

When my client complained about xeroxing which had almost have of the pages dominated by heavy gray tones those pages were replaced, without repair of the copying machine.

The FBI has machines that will copy mechanically-fed originals at a rate of two per second simultaneously collating 50 copies. These are protected by service guarantees that amount to almost instantaneous appearance of a service technician. Despite this my clients still received incomplete copies of less than normal legibility, sometimes illegibility.

There are two rows attachments that in all cases have not been provided although the records state these attachments are physically present in the files. In all the months of the delivery of these records not a single such attachment has been provided after originally withholding.

With regard to several less than faithful and defamatory references to my client a single phone call would have produced the original, the source of which is stated.

My client has asked me to select this particlar one of hundred of illustrations because the rproduction of the withheld attachment would enable to him prove the deliberateness of the dishonesty of that record and the secrect creation of a false and defamatory record relating to him. It would also enable him to prove beyond question that the descriptions of him and his attitudes of this to now insane star-chamber are deliberately falsified. he authorizes ~~in~~ me to state that he is prepared to produce a witness to confirm him and to testify under oath and subject to all the penalties of false swearing.

It is I believeclear that there has from the first been a continuing campaign to violate the act and deny my client his rights under it by whatever means possible simply because my client's work is of difeferent orientation and direction that that of those who achieve considerable public attention and because my client's record of accuracy in fact is exceptional.

Defaming him is consistent with if not essential to this end, an improper end.

The ~~extremes~~ allegation that he is against all police agencies, including the FBI and the Department and gov ruments in general could not, to respondent's own knowledge be more false or more deliberately and ~~maliciu~~ infamously dishonest.

My clients services to respondent, for which he has never received a penny from respondent, go back four decades. Intermittently it has continued to recent years. Last year in my presesnce he offered unpaid assistence to the FBI when still another re-investigation of the king assassination was announced by respondent. Several years earlier he delivered to the FBI the secret, internal records of the most violence-prone and most prepared and most sophisticated of the right-extreme vigilante groups. He also delivered them to a local police agency of expertise and need. The FBI lacked the common decency of writing him a letter of thanks, although the records he has not received show the most elaborate and costly preparations for responses by the Directors are to even those who are clearly irrational. Instead an agent returned these records to my client and read what he had been directed to say from a written note on a writing pad.

The false record that is here in question was other than is represented in 10% percent of the detail. it actually is the result of my client offering exclusive work of his own to assist in a prosecution. I have participated in a number of federal prosecutions and in one case I exclusively provided the information that led to a plea of guilty.

I have worked with a nu,ber of district attorneys and local police agencies.

In no case have I asked for or received a penny for my work.

I have been an expert consultant for respondent in a very large prosecution. In this and related problems I was entrusted by respondent with the most delicate of missions and

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and prepared to testify to them without prior notice. I do believe this should be in camera because of the nat ure of these missions. These include some FBI agents would not do and some for which FBI agents were responsible.

Particularly despicable is the false allegation of subversion.

At respondent's suggestion I was of service to British intelligence during World War II, again without pay. I have rendered no such service to any other government

My client's requests under the Acts for this respondent's records relating to him are so old that in the ensuing 19 months he has not had a single record deligered under a ten-dat law and none months after he proved in this courtroom that other requests of that period had then been complied with.

My clients first request that this respondent do something about what he regards as improper intrusions into his life was in 1969, eight years ago. Still not a single piece of paper in his hand. Motive is obvious to be poisonous in this instant case. To defame.

When I informed my client by phone that such records had been given to me for him, he reminded me that the FBI had told us they will make available to all what they make available to me. I immediate wrote the FBI stating this was a deliberate violation of the Privacy Act. And of more.

In not a single withholding has the respondent cited the Privacy Act in this case.

In writing the FBI, before I could get these records to him, my client informed it that upon receipt of all the records and relating to him he personally would make them all public, but that he would not agree to an ex parte disclosure of falsehood out of context.

As soon as my client received those records of which I had told him he wrote the FBI further, including contemporaneous proof of both official falsification and deliberateness in this falsification.

He informs me he has received neither acknowledgement nor denial.

He further informs me that if anyone is willing to testify in opposition to what he represents if both are subject to penalty my client also will testify to what he represents.

My client has provided the FBI with his own unscrrected notes of what is referred to of the past plus a copy of the letter respondent wrote him plus the first page of respondent's enclosure.

He has provided me with the same copies. They represent diametrically the opposite of what the FBI wrote in secret defamations of the kind that manage to putrify countless official files.

All of this is part if a pattern. It represents a deliberate official intent to deny my client his rights and to defame him and in this manner to further dmage him and further interfere with those rights we once thought sacred.

An added consequence is to delay compliance and still another to wear him down when there is no reason to believe his health ill improve, his energy increase or some magic will give him more years.

We can anticipate the plaint we have heard in other courts -this man can't be satisfied. look at all we have given him. To credit this is to find that the casting of 20,000 ingots of lead is to succor one who is drowning.

My client has not asked for all the letters writtenn the late Director by his admirers or the demented of several nations. Or the results of the search of domestic-intelligence files before they were acknowledged. Not even for the responding letters.

He did not request copies of all the obvious fabrications with which the FBI was inundated.

What he did ask for remains to be supplied, valuable a historical record as these pages are for other purposes. My client wants to continue obtaining and depositing these records that have been offered and are nor responsive to his requests. But he also wants those records that are responsive.

There is an added value in what has been delivered. It shows that what is essential in questioning the FBI is withheld from the FBI [illegible] records. One example within my client's requests is what is known among by the code name Cointelpro. In honest record keeping

and filing within FBI HQ these should be in the first Sections. We are at the end, have examined more than 80 Sections, without a single reference to this and with the association of those named with the Gintelpro operations not indicated.

The volume of what has been give - perhaps it would be more accurate to say sold to my client - is no measure of compliance with his requests.

Only now, after all this time, probably more time than in any FOIA case this one now being more than eight years old, have we been promised any compliance from any of the files that could reasonably be expected to hold that which my client has been seeking since early in 1969.

When my client asked for a search of the files he specified he was refused. The reason then given was that first this one had to be completed.

This alone enable there to be an uncontested new report we regard as still another whitewash and a renewed coverup.

We now know that the assurances given this court in this regard, the affirmations filed and the letters written are false.

This court was assured of a search of the Memphis Field Office. What this court was t en told is untrue. We still await the first record from that Field Office.

After more than 8 years under a 10-day law. There was no backlog eight years ago.

Now that the Attorney General has found t is to be an historical case my client wants to continue to obtain all these records not within his original requests - he has amplified them since -so that he can deposit them for the people, the purpose of the Act. If his request for the remission of all charges is not granted, ultimately by the courts, then although he is without means of any consequence or any regular income my client will, as he has to now, find some way of paying the costs.

However, the basic question before this Court is compliance with my client's actual requests under the Act. We believe that after all this time, after all my client's patience, it is not asking too much of this Court to request that it now order full and promptly reviewed compliance with what my client does seek and at anyrate this Court now finds reasonable.

It is not only the exceptionally long history of this case that prompts this request.

Since this matter has been before this Court my client's physical capabilities are reduced by more than half. Recently there has been a week in which he could hardly walk short distances and then not without pain and limping.

In recent years he could go off an investigating trips lasting a month and work around the clock. Reecently he left for six day to collect evidence for another FOIA case. He returned the morning of the sixth day. He then was so worn I did not trust him to the bus. I drove him home. In broad daylight he fell asleep sitting up in my car. In the following week this repeated itself on a number of occasions, even when sitting at his desk.

In this and another historical case my client has done work done by no others. He has knowledge possessed by no others. There is no possibility of any commercial reward to him from the work upon which he has been engaged. There is the certainty that he can help make real the purposes of the Congress in enacting the Freedom of Information law, especially as interpreted by the then President and Attorney General.

He has designated me one of his executors to assure this end.

However those with so much to hide and much to lose with there cannot be a more unselfish endeavor.

Last year the court of appeals held that what he seeks to do serves the nation's interest.

These and other factors, I believe, more than satisfy the exceptional circumstances requirements.

There are many other factors. One of which the Court may be aware is the time he spends informing the press, answering its inquiries.

My client has specified but one restriction, the rights of others be observed. [illegible] long before these desirable aims belatedly surfaced he waived all privacy rights relating to him once all the records were collected.

It is his unshakeable belief that this is essential in any evaluation of his work.

It is his hope that whether they be law students or those of political science or historical interest all his work, all his records, all these records, be freely available, including to what the Act terms "any person."

I therefore now ask this Court for what it regards as reasonably rapid compliance without indefintie postponements of rewviws that make reviews meaningless;

with this to proceed on a reasonable schedule as the Court finds a schedule to be reasonable under the circumstances;

with affirmative first-person affirmations of all withholdings so that there can be an end to these unseemly frivolities that have characterized this matter from the first to now;

with thi s now to be directly responsive to my clients requests rather than the option of the respondents;

for the remission of all costs, which my client has already designated for use in other FOIA matters rather than for improving the conditions of his life;

and for the setting of a time and a place for determining whether in all of this there has been damage to my client and whether and in what amount he is entitled to damages, any awarded to be used exclusively not for his personal benefit but for the perfecting of the unofficial free archive he has established.

I think that although having learned of it I may well counsel my client otherwise when my client agreed to the establishing of the free archive years ago and after his attorney had recorded his desires and designated me one of those to carry them out after beginning the deposit of his records he did not take or seek a tax exemption.