

HW 12/16/78

I didn't get a chance to read 'o Ann Dolan's Motion to Quash until tonight. I'm not taking the time to check the date of Smith's Order because that will not make any difference to me.

I would like to appeal on the basis of depositions being denied. If we can't do that can we file a Motion to Reconsider? I do not want to waste time on interrogatories. You've got law school in your mind, not reality and our prior experiences, if you think you'll do anything but waste your time in preparing interrogatories.

Besides, this whole thing is an outrage and I would like to tear one or two of these bitches (aka women) up a bit. The same "# %& Division of the same DJ opposed out taking interrogatories in 75-226 and said we should have taken live testimony and the appeals court held that is the essential way.

This is not in the Motion signed only by women this time. All sorts of other citations not on this issue or in this jurisdiction are cited but not the one most in point.

I've marked a few places with paperclips if we go back to this.

There is much in the Motion that is without factual basis or any basis in the affida its provided. If these women want to give testimony propose that they qualify and be given the opportunity. There ought to be a reasonable limit to what a judge will allow that is not in the record. If we have a judge who won't then let us give it up and go to what can be productive. This certainly can't be on their terms. We have to stop dangling on their endless strings. If we can't, we can do other things and not have futilities.

I remember 75-1448, when they didn't answer most of the interrogatories and we got shunted all around and wasted ourselves.

You are not going to change them because he ordered interrogatories. They have the same reason for not responding to interrogatories that they have for fearing any live testimony. They've lied under oath, deceived and misrepresented and if we do not get to depose them we'll accomplish nothing by any other effort.

I don't see how the appeals court can hold otherwise after No. 75-2021, in which it could not have been more explicit on this issue.

They are going to have as many women on your cases as they can possibly put on them because they have read you as a nice, quiet type who will take that kind of crap. Until you clobber one or two this will not end.

But when one of my own cases is the one most in point I can't accept what Smith ordered, which is dismetrically oppose what the appeals court held. I don't then it will take nearly as much time to appeal as it will to prepare interrogatories anyway, and the interrogatories are a sure loser. So please file a Notice and let us go that way.

I'm not in a grouchy mood or anything like that. I feel pretty good. I was able to do more than in recent days today and did, and that made me feel good and the results of the exertion I think were also good.

The Motion took a long time to get here. I got it only yesterday

You can also have some fun with some of the hype, like the important national security responsibilities of the affiants. Like Iran? Egypt? Isreal? All of Africa? Nicaragua? Some of their projections? It would be easy to argue with this the CIA's recor, confirmed by the President, that we can best serve "national security" by keeping these characters busy on other endeavors, like living within the law and not lying to courts of law.

I have 1975 request, even 1971, the CIA has not complied with. They do nothing they don't want to do without compulsion. And we have the content of the ex. sess. transcripts.