

Dear Jim,

3/5/81

Re 78-0322, your 3/2 to "resson, copy on 3/3 to Metcalfe:

In his affidavit Wood also states that FBI policy with regard to the withholding of SA names was permanently changed and the claim was abandoned. This is in his explanations preceding one of the sample records, or more than one, rather than in the aff. proper. I think it is more important than what you do say, which is accurate.

Cole's Memo of Points and Authorities in 1996 of 3/2:

I think it is time to make a vigorous statement of his toying with and demeaning the Court on this. These newest records include those for which no claim for exemption is made and where there is claim to exemption, made in such a way as to make it uncertain what claim is made. Where he refers to 30a, I think I addressed that one in my response affidavit. If I did it is apparent that once again they have ignored what I have provided. This case has persisted this long in court because we've not made any real effort to get them to address the evidence I've provided. They thus can lie and ~~repeat~~ repeat their lies long after they are proven to be lies.

It is my understanding of the law that all non-exempt records must be provided. I think our list includes withholding for which no claim to exemption is made, and the Court never told them they don't have to abide by the law.

He is really ridiculing her Order and her position. And, of course, stonewalling, as usual.

Hastily,