

Dear Jim,

5/6/82

I have read and annotated the DJ motion for its own kind of Vaughn in CA 78-0322. It represents a crude and heavy-handed attempt to intimidate the court and to convert it into a rubber stamp for the avoidance of proper searches and of compliance itself.

However, I see a possibility of converting these statistics intended to intimidate to good uses and of simplifying this - and saving the government much time and money.

Off the top of the head, and subject to our discussing it \*

I waive the Vaughn entirely, in return for:

Processing my appeals,

Providing what was promised and was not provided,

Searching for what remains withheld because it is outside <sup>for searched</sup> the main files, like the stuff on the critics,

Agreement on paying legal fees, etc.

There is no possibility that I will not be able to tear up even a 1-100 sampling, and I have no reluctance in your letting the attorneys know it.

What I propose will entail enormously less work <sup>and cost</sup> than they offer, will come closer to compliance, and, if complied with, will make me willing to move to dismiss.

While they may complain about paying legal fees, their own statistics in these papers is an adequate reflection that we adequately prevailed. They can hardly claim that they would have made voluntary disclosure after the record they made for themselves in the general disclosures and in this case. (Of the 26 items Phillips lists, they originally tried to get away with only 40. Which is to say that I compelled the disclosure of the other 16 of their own itemization.)

We can talk about the things I noted later, if there is need to. I'm sure you are aware of most and there are not that many.

Hastily,