

Dear Jim,

re C.A. 78-0322/0429 hearing

3/14/83

This gives you a chance to take another initiative and to overcome an oversight in your recent filings of which I've written you recently.

Throughout this case I have consistently alleged that Phillips is always untruthful and my affidavits contain many specifics. I therefore ask, and I feel the need very strongly, that you move to compel him to address each and every allegation of untruthfulness. Basic in any litigation.

We've already started this with your motion to expunge, ~~in~~ which you should, I think, have included the prior attestations to his untruthfulness that are almost entirely ignored.

Resumed 3/15, a few minutes before leaving for Ed's medical appointment. Gives you an idea of the problems of these interruptions.

Haile is either crazy in pressing for a hearing or has something wrong in mind and expects to accomplish it. Instead of merely reacting to his initiatives, it becomes, I think, necessary for us to take some of our own and the truthfulness of their allegations ought be most basic.

I think you ought file something like a motion to compel to require them to produce the record copies of the documents called for in out request for the production of documents - before that hearing. This will <sup>show</sup> as the affidavit you did not file states, the deliberate dishonesty of their response. And they'll not be able to make any adequate or honest response. Copies exist at both FBIHQ and the field offices and we should ask for both. If not a motion to compel, some kind of motion but this also is important and prior to any hearing.

Unless we focus on their dishonesty this case will never end and Haile's dirtiness will perpetuate itself.

I've found my second affidavit in 92-0756 but not the first. I still do not know the numbers of the files involved, which makes a problem, and if you have to file this Monday, I doubt it can reach you in time for you to make any use of it. I'll keep working on it when I can because we'll probably talk before then.

I enclose the story and picture of Elizabeth I've just received from Dave in the event he didn't send you one. Quite an accomplishment for her. She's growing into a beautiful young woman.

You are going to find that EdHaile is just as dirty in court as he is in all other ways, so I believe you must screw yourself up to really fight or we ought just wipe the case out as best we can. If you do not fight with vigor now it will never end and I'm not going to spend what remains of my life dangling on the end of their strings. It is difficult enough to get any work done and I ought get back to writing, without interminable interruptions for affidavits that for the most part are not used, just filed and forgotten by both sides.

Hastily,

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