

JL- Records to have been provided and not provided HW 8/24/80

Shea agreed that absent a legal basis for withholding them the lead cards in both cases should be provided to me. The attached appeal is a reminder that they have not been. The FBI was to have articulated a legal basis for withholding them or to have processed them. I have not heard anything further in 10 months.

With Cole always pressing for summary judgement and always claiming complete compliance I believe it is important now, while he is having to undo some of what he has ~~managed~~ done, to give him a 10-day reminder about them, alternative a motion to compel. It can be as short as the appeal, which will not take the judge/clerk long to read, and it will be apparent that the FBI is not in compliance and knows it while it seeks summary judgement.

I urge that you send a copy to Metcalfe, too.