

2/6/71

Dear Jim,

This is written immediately after our phone conversation, before I get onto the reading and editing of the "Argument" I have drafted and will go over. In tyoing it I made a carbon for you, as I did with the enclosed. As soon as I edit it, I'll send it also.

I wrote it first, for a number of reasons, one being to get a better understanding of just what trickery Werdig & Co. were up to, and another in the hope it would give me a better factual and legal grasp of what is involved, of the fact, law and regulation.

My feeling, after a few moment to think of it, is that Werdig has gone a bit too far for a judge like Gessal, and I ought make a more complete court record of it. This will be more clear when you see what I'll have in the affidavit, which will also alude to his attempt to track me into a default, as you yourself heard, on the phone. That is entirely consistent with his not sending the affidavits and exhibits to begin with, with his not sending them by the time of my first request, through you, and by his admission that he had not even started to copy them when you made the second request for me. I think there might also be an affidavit from you setting forth both of your conversations with him on this.

I'm not sure I understand one point you made on the spectro, but I'm adding it ^{ca} ~~as~~ to the opening of the ~~op~~position and Motion.

Sincerely,