

Mark Zaid
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12/8/95

Dear Mark,

With ~~your~~ ^{Jim's} letter of December 4 ^{you} sent me a copy of the amended ^d complaint in the Hickey case. Among other things Jim asks me if I see anything wrong with it- AFTER he and you filed it.

His recap in his letter is also inadequate but he does say that he sent me what the other side had filed some time ago. When I got it I dropped my own work and interests and read it and put paperclips where I believe there is what you should know and perhaps do something about. Only I've not heard from Jim since then. ^{about it. I told him what I'd done} Based on that alone, and it is far from alone, why ~~is~~ ⁱⁿ the world, particularly at my age and in the state of my health, should I take even a minute to read what you sent?

I was in touch with Hickey and his family over a period of time through another retired Secret Service agent who had been on that White House detail with Hickey. In time this led to Hickey's daughter being in touch with me and I suggesting to her that Jim could handle a suit for her father against Donahue. I believed that was in Hickey's interest and that it would be good to expose the Donahues and his ilk. I sent her some of the information I have and she seems to have given that to Jim. But although I got the case for him, Jim, sensitive as it seems he has become to what are referred to as "insults," never bothered to tell me he had taken the case or to ask how I could be of help in it. When I learned by accident, and that was before he went to Singapore some months ago, I wrote and told him I have what I believe can be helpful to him. Before then and after he took the case he was here for other reasons and never mentioned that he had the case or asked to see what I have.

I did go into some of this with him by phone but neither you nor he had any interest. Now he says maybe he'll come up and look at it. My belief is that any lawyer filing such a case ought know what he is doing before he does anything at all. Not say that maybe he'll take a look after he files an amended complaint. And has had responses from the other side he was not fully prepared to respond to.

As I told Jim more than once, that book was not Donahue's first assault on Hickey. It appeared first long earlier in the Baltimore Sun. After what I wrote that reporter about his article he had no more to say about it and was not, as you can see, Donahue's ghost writer.

As I told Jim Donahue was in touch with me and with ^{his} ~~his~~ wife came to visit us. What he says in his book about that is false, and Jim has reason to know it is false.

As I told Jim also, when Donahue was here I told him how he could prove to

himself that his theory was in fact impossible. Knowing that, Donahue still proceeded with his defamatory book. And this was not worth including in either the complaint or in the amended complaint?

I told Jim that St. Martins, and you sue it also, gave as its excuse and justification for publishing the book that Huckey had not responded to letters and phone calls. Yet as I also told him I have a clipping of an interview given abroad by the investigator they or Donahue had working on the case and on Hickey. That investigator, from recollection, made it clear that Hickey had such psychological problems he would talk to nobody. (And he has never spoken to me.)

Whatever legal meaning this can have, it also is not worth including in the complaint or the ~~amend~~ amended complaint - it would have no impact of any kind?

That Donahue has a record of lying about other things in that book has no meaning, lying to defame? Jim knows I never had any interest in my records being at Maryland, what ~~Donahue~~ ^{Donahue} made up to defame me, or even at my own Alma Mater. Jim knows they have always had a home. ~~He~~ ^{She} he knows that Donahue lied ~~about~~ ^{about} that in his book. A record of his lying in his book has no import when you are suing him about his lies in that book?

In all this time since Jim took the suit, and I'm certain he has been here since then and knew he could have copied anything he wanted, Jim had no time at all for what I am confident he can use if in ~~fact~~ ^{fact} he does not need for that suit. But what does he have time for? Anti-Kennedyism, for all the world as though that can help bring the truth about the assassination to light. His taking the suit he took for Judith Exner is inevitable taking time to smear the assassinated President. And it can have no connection with the assassination except in the minds of apprentice Keystone Kops who imagine themselves Kerry masons.

So why with this partial history should I take any time at all to read the amended complaint, or be prepared to make suggestions when they are too late in any event?

If Jim wants copies of what I have he does not have to be told he can have them. Or even an affidavit from me if he wants that. But I'm not taking time to read the amended complaint after it is too late to do anything about it.

If you or he, and I'll send him a copy, can find fault with anything I say in this please tell me. You are lawyers and I am not.

If you cannot, try to keep it in mind when others are told that I go out of my way to write "insulting" letters. To Jim in particular.

Sincerely,
Handwritten signature

JAMES H. LESAR
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December 4, 1995

Mr. Harold Weisberg
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Re: Hickey v. St. Martin's Press, et al.

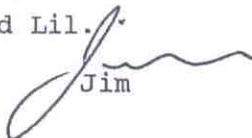
Dear Harold:

When I sent you Donahue's motion to dismiss in Hickey's Maryland libel suit, you commented that we should have consulted you about complaint before we filed it. I gathered you felt there had been some error in it that might hurt us down the pike. Since this was apparently based on an inference from something you picked up in the motion to dismiss, I don't know whether or not you are right. However, I am enclosing a copy of the amended complaint we are filing in Hickey's New Hampshire lawsuit. If you see anything amiss in it, please let me know.

Thanks for all the help.

As soon as I can find the time to do so, I will be up to take a look at your Hickey file.

Best regards to you and Lil.


Jim