

Jim, I got up a little earlier than usual, 4 a.m., to be able to go over the deposition made by William Dobrovir taken from Bennett. Yesterday your description of Dobrovir was of what I take to be a man a little officious and self-important, perhaps a little socially delinquent, arrogant and perhaps a bit paranoid. From news accounts of his trial work I had assumed him to be a real live wire, hot stuff. Perhaps he is, but he was not in this deposition. You said that he had limited purposes. Even taking this into consideration, I consider this deposition a model of professional incompetence. It is not only that Dobrovir was unprepared with fact to use as a basis of questioning, which is the case, it is that he missed obvious leads from what Bennett did say. As examples, the names Haldeman and Ehrlichman were never mentioned. How could Dobrovir not ask if he had any dealings with either? If he had, he'd have learned, on any questioning at all, that during this same period he dealt with them in the sense of informing them of ITT matters, among others. I think this is an obvious line of questioning, even with limited objectives. He never mentioned True Davis' name, and I can't understand how he missed that when Davis' bank was involved in the deposition. Moreover, this testimony as it relates to Hunt is not consistent with the Williams deposing of Bennett, so one of them didn't do his homework, depending on which deposed second. By "limited" I presume you meant to the use of dairy money. Even in this limited sense this is a very bad job. How the money was used or could have been is among the things that could have been relevant, is it not? No questions about anything he ever heard or knew or was told by Sloan. He wasn't even asked if he had any contacts with anyone else at either CREEP other than Sloan. No mention of any but Finance CREEP even.

This is as devoid of fact as you said. It makes me think that examining the depositions of the secretaries may be more important. I gave you their names again yesterday. Perhaps we can skim them at the court if not in a lawyer's office? HW 12/12/73