

Dear Howard,

3/14/79

Your Memorandum in the spectro appeal is a fine piece of work in every way. I like it even more on reading it than did on hearing it over the phone.

I'm also glad you added the last sentence to the first graf to suggest at the outset that the court can enlarge the record, include the new material without remand.

The issue is not going to go away. I'm preparing more for other cases, all dated in newness and all essential to any fair decision.

It impressed me that you were able to avoid legal jargon while saying it all legalese.

It is fine, succinct, lucid and persuasive writing.

I do have more from what the college women working on the records are finding. And dating as they find. I'm finding more as I get over the Sections and then I date it.

And poor Lil is cawing like mad!

Wait until you see some of it, CIA and FBI both.

If there is the oral argument on the 20th both women want to be there so I have a wife and do not have to depend on the restrictive bus return schedule. I'll have a package for you then.

If they delay it, as Jim thinks can happen by returning to district court, unless there is purpose in my going in I'll mail it.

Progress on the FBI's JFK files is fine. All are integrated, all in clearly identified files folders through all FBIHQ releases except the bulkys. Half of the Dallas bulkys are filed this way. I have them next because they are more important and much more voluminous. They will be followed by FBIHQ bulkys, about 15,000 pages. Then the field office files, which require only moving because I did them all as I read them.

Or, access will from now on be much easier.

As I go through each Section I'm shown a record in I'm making copies of many for subject filing and to this moment have all of them filed. This is a separate file that, with help, I'll be able to keep in better shape. Once all the major filing is done I'm having this woman make me a card file on all subjects. Then I can mark each copy without having to leave the office and can add subjects as needed, with only filing to be done in the cellar.

Many cabinets as I had down there it is clear I'll need more soon. Or haven't you seen them? (Still 9 2-ft. cartons to empty, FBI alone.)

Many thanks. Hope we can get together Tuesday, which would mean oral argument.

Besty

JDW: I'm so proud! ...Thursday afternoon, with JL to leave town Friday, the court of appeals called and said they want memos by the 16th on our effort to enlarge the record before it to include what the crooked FBI withheld that I nonetheless got after district court ruled against me. Jim is not returning until the day after the memo was due. All he could do is ask Howard to pitch in. Howard has a full-time plus job with a major law firm. So all he could do is say that he'd work on getting ready Saturday, draft it Sunday, get it retyped Monday and have it filed by another before he also had to leave town on his work on Tuesday. So aside from the time pressure he had the great liability of getting into a case with no time, little knowledge of its long record, and filing in the name of another. What a superb bit of thinking, writing and research for case citation under any circumstances, much more under these. Best HW 3/14/79