

MEMORANDUM

April 13, 2017

TO: Laura Denk

FROM: Doug Horne

SUBJECT: Upcoming Depositions of Dallas (Parkland Hospital) Doctors

As you know, I recently contacted Judge Tunheim via e-mail and expressed to him some concerns I had about the upcoming ARRB depositions of Dallas Doctors who treated President Kennedy on November 22, 1963 at Parkland Hospital. In accordance with Judge Tunheim's direction to me in his 7/29/98 response to my e-mail (attached as enclosure one), I am writing this memo to ensure that you formally know my concerns.

The Board Chair made clear in his 7/29/98 e-mail that **he intends for me to assist Jeremy Gunn in conducting these depositions.**

I have already assisted the project in the following ways:

- (a) I voluntarily, on my own initiative, provided Ron Haron, our new General Counsel, with the phone numbers and addresses of any 1963 Parkland Hospital physicians we might invite to ARRB depositions, when Ron told me on July 28, 1998 that Jeremy had asked him and Jerrie Olson to "take care of the logistics" of the evolution, or words to that effect.
- (b) I voluntarily, on my own initiative, gave Ron copies of the previous testimony and written statements of the Dallas Doctors, after Ron told me on July 28, 1998 that Jeremy wanted to read this material. Ron gladly accepted them from me, and intends to pass them to Jeremy. I have also created formal exhibits of these same items in our original box of medical deposition exhibits, and Ron has been so informed.
- (c) I asked Ron today who on the ARRB staff was going to make initial contact with the Dallas Doctors, and when, and he said that Jeremy wants him to call two of the 1963 Parkland treating physicians, Dr. William Kemp Clark, and Dr. Robert N. McClelland, today. I volunteered information on their personalities and past attitudes regarding how "approachable" they have been perceived in the past, and also volunteered that, with Jeremy's permission, I had called Dr. Clark, representing the ARRB, in December 1995, and asked whether he would meet with Jeremy Gunn in Dallas that month. (Ultimately, Dr. Clark refused to speak with me, said he would only talk to Jeremy, and asked me to request that

Jeremy call him; Jeremy later told me that he never did call Dr. Clark.) I also explained to Ron that the ARRB had interviewed three former Parkland Hospital medical personnel in Texas, in 1997, since these persons had not been interviewed about President Kennedy's wounds by either the Warren Commission or the HSCA, and I gave him their names (Dr. Crenshaw, Nurse Bell, and Dr. Grossman). I thought that it would be useful, possibly essential, for Ron to know all of this background information prior to making these critical phone calls. He listened attentively and seemed appreciative. Although I had wished to do this myself, I nevertheless wished him luck and provided him with positive encouragement.

In the past, aside from being the person who coordinated all of the logistics with the deponents and the National Archives, and being the person who created any new exhibits and added them to our exhibit box, I prepared draft lists of questions prior to each medical deposition for Jeremy, and sat beside him during the depositions, handing him exhibits as needed, and quietly writing down proposed follow-on questions at appropriate moments.

Accordingly, I hereby attach, as enclosure two, a draft outline of proposed areas of questioning for each Dallas physician we may depose. It is generic in nature, since our methodology in this particular matter should be to ask very consistent questions of each deponent. I am pro-actively providing this assistance without being asked, in the spirit of Jack's e-mail response to me of 7/29/98. Please pass this draft outline to Jeremy Gunn.

Furthermore, I volunteer my services, if they are needed, to assist Jeremy with the exhibits during the deposition, as I have during all eleven previous ARRB depositions involving medical or photographic witnesses involved with President Kennedy's autopsy, or post-mortem photography.

I now feel I have complied with both the letter, and spirit, of Board Chair Tunheim's direction in his 7/29/98 e-mail addressed to both you and me.

He clearly expects me to make known my concerns about assisting with this evolution to you in your new role as Executive Director, and allow you to handle this matter within the staff management structure, at the staff level. He may feel very strongly (and you may as well) that I should have exhausted all possibilities for resolution at your (*i.e.*, the Executive Director) level before sending him my long e-mail of 7/29/98. I went directly to Judge Tunheim when I did because you were on vacation, you had made unmistakably clear to me that you were quite uncomfortable being placed in a position where events had (perhaps unfairly) forced you to serve as mediator between Jeremy and I, and *most important*, many of my concerns were about who made initial contact. *Time was of the essence, hence my decision to immediately relay my concerns to Board Chair Tunheim.* [My concerns were borne out today when Ron indicated that Jeremy's intent all along had indeed been for Ron to make initial contact with the prospective deponents...and that he wanted Ron to do that today.

Therefore, my sense that I was not being included in critically important initial activities was valid, and was not a misinterpretation, or over-reaction, to Jeremy's actions.] In any case, all of this is now water under the bridge, so to speak, and we must all move forward. I have written this memo so as to be in compliance with Judge Tunheim's direction, and also so that I cannot be misquoted or misunderstood. That happens all too easily, and all too often, in these types of situations involving human relations problems. I have already assisted in preparations for these important depositions (voluntarily), and desire to be of further assistance. I request your help in making that happen. I have invaluable experience and corporate knowledge in this area of ARRB activity, and since I am still a full time staff member working for the ARRB, also feel I have earned the right to participate, in person, at the depositions of the Dallas treating physicians that are interviewed by the ARRB staff's paid consultant--Jeremy Gunn. I believe I have earned the right, by my hard work, for professional closure in this area.

Thank you very much for your consideration. I look forward to feedback.