

June 26, 1996

BY FACSIMILE

Mr. Robert Groden
212 Emily Lane
Boothwyn, Pennsylvania 19061

Re: Limitations on Subpoena Duces Tecum for the Production of Documents and
Appearance for Testimony Before the Assassination Records Review Board to
Robert Groden

Dear Mr. Groden:

I am writing this letter following our June 25, 1996, telephone conversation, in which we discussed possible modification of the terms of the above-referenced subpoena.

The Review Board agrees to some modifications of the scope of the subpoena with respect to the page entitled "Documents and Photographs" as follows:

First, paragraphs one (1) and three (3) will remain in force as written;

Second, paragraph two (2) will remain fully in effect except to the extent as specifically limited in (a) and (b) below:

(a) you *are not* required to bring (other than in conjunction with your work for the House Select Committee on Assassinations) any images or records that you enhanced, enlarged, rotoscoped, or Grodenscoped; and

(b) you *are not* required to bring any mass-produced images or records that are widely and commercially available to the public (*e.g.*, commercial videotapes, books, or pamphlets).

Thus, under paragraph 2, you continue to be required to bring, *inter alia*, any responsive records or

Mr. Robert Groden
June 26, 1996
Page 2

images that you obtained, prepared, or created in conjunction with your work as a consultant to the HSCA (*including* any rotoscoped or Grodenscoped materials). You are also required to bring, without limitation, all responsive records or images that you made or had reason to believe were made from original source film (or early generation film) or that is a film to film copy of an original (or early generation film), regardless of the format of your copy (film, analog videotape, digital videotape, etc.).

As I mentioned to you on the phone, you should continue to interpret the subpoena in the broadest reasonable form, but should you have questions you should not hesitate to contact me so that we can resolve the issue in such a way as to avoid creating any unduly burdensome requirements.

As we discussed, you are fully entitled to be represented by counsel prior to or during the deposition.

If you have any additional questions, please feel free to call. I look forward to hearing from you with respect to a proposed alternate site for the deposition.

Sincerely,

T. Jeremy Gunn
General Counsel