

Attorney-Client Privilege
Work Product Protected

Issues to be raised with counsel

Connick litigation
Grand jury records
ARRB Computer searches
RIFS re: Garrison, etc.
FBI
DOJ
NARA
CIA-Miller

Questions/issues for NBC

General

press release about litigation

Law

disqualification of Miller, Cassidy
which law applies LA, DC, MD, NY
Carlie
elements of privilege
waiver of privilege
powers of Review Board/JFK Act

Facts

did Sheridan write articles/books about work on NBC
try to i.d. documents at issue
call Jim DiEugenio
Miller contacts with officials regarding Sheridan info
NBC should make available to ARRB all outtakes they made available to others
NBC should make available to ARRB all internal files on reasons for granting access and denying access

Herbert J. Miller (limited to his non-privileged communications with government officials and other persons regarding Jim Garrison)

about Jim Garrison between Mr. Miller and