

## ATTORNEY-CLIENT PRIVILEGED MATERIAL

The thought that sounds superficially-----for him to compile a list...

Even if he had a dictating machine, it would tak him months to go through and name all of these things.

The things that he did get from Evelyn Lincoln - I have a list (?)

A lot of the things are campaign buttons - trinkets, etc.

- The really important things that he got from Evelyn Lincoln (to go through and do a list would take a long time

- He can find things - documents, items that would saisyfy a specifically targeted requet...

-You can't deal with private citizens - its never been tested.....

- On the subpoena itself, we will produce a fair amount.....on certain things

- In two weeks we'll have what you don't object to

- Some judge is not going to say - lets have you turn over all records from Evelyn Lincoln

- U.S. Government can't say....

We'll file an objection and then leave it up to you....

We'll consider taking it up and see what the Court of Appeals has to say

- If we loaded up all the stuff and drove up with it in a truck, .....what you're really fighting for....

Types of things from E.L.

- A list of senatorial and White House campaign buttons

- Thousands of photos of Kennedy - both as a Senator and as a President (nothing assassination related)

- He's got a rocking chair in her office

- Various items that were on her desk.

- Trinkets that would sit on the President's desk for a day

- He's got miscellaneous notes to Mrs. Lincoln from JFK or JACKIE  
(Merry Christmas Mrs. Lincoln)

- He has things that hit the trash can....

Then he went through and talked about the things we will produce.....I tried to clarify something and he flared up - I'm not going to play this game, etc.

- Then he said, "what we're going to produce, is what we think is reasonably related to the subpoena."

I'm now going to capsulize this and I will return this in writing.....

Tentatively, we're going to produce:

Paragraph 1

Paragraph 2

Paragraph 3

Paragraph 4 - We've already given just what I read to you - I've got a list from my client.....(I'm not going to give that to you.)

Paragraph 5 - We'll object to this in its entirety

Paragraph 6 - There is no such document (it doesn't exist) We're not going to produce anything else.

Paragraph 7 - I don't believe anything exists under the description that you gave - I'm going to object as to breadth and irrelevance

Paragraph 8 - I believe that the only area of documents that would be responsive is the Guernseys - his contract negotiations, etc. ....will object

Paragraph 9 - I already have given you this. We'll provide it..

Paragraph 10 - Answer is none (We're going to file an objection)

I'll get it to you in 2-3 days. We chose February 18, 1998 at 9:30 for the deposition.

He kept insisting that it didn't apply to private individuals - I told him it did and he glossed right over that.....didn't want to hear what I had to say - figured I'd let him do the research.....