

WHITE DEPOSITION PREPARATION OUTLINE

- I. Introduction
- II. Brief Background (includes relationship with Evelyn Lincoln)
- III. Production of Items pursuant to Subpoena Duces Tecum
- IV. Go through each item and ask following questions:
 - A. Where did you get it?
 - B. From whom?
 - C. Condition when you received it?
 - D. Altered in any way?
 - E. Provenance documentation?
- V. Subpoena - Go through paragraph by paragraph
 - A. Go over what we asked for
 - B. Verify that he produced it
 - C. Have him state why he didn't produce it
 - D. Paragraph by Paragraph
 1. Paragraph one
 2. Paragraph two
 3. Paragraph three
 4. Paragraph four
 5. Paragraph five

6. Paragraph six
7. Paragraph seven
8. Paragraph eight
9. Paragraph nine
10. Paragraph ten

VI. Controversy surrounding Lincolns' estates

- A. Go over the accounting and see if there are any issues which pertain to him

- First order of business -
- Did you bring this subpoena in response to ?
- Mark Exhibits of inventories
- When Marking inventories - ask for foundation
- What's the basis for your estimate of the number of items in your collection
- From the 100,000, you produced.....here today.
- What did you do to guarantee that your search was conscientiously made?
 - Have you ever reported to the press, something different?
- In a general way, how do you have your collection organized?
 - Have you ever had any lists of your collection?
 - Box lists?
 - Card lists?
 - File cards?
 - Computers?
 - Audio recordings that you've made explaining your collection?

- What did you do in order to comply with the subpoena?
- What steps did you take?
- Did you go through every item?
-
- What did you do in order to comply with the subpoena?
- Did you do different things to prepare for different paragraphs?
- First Round - overall global approach
- How many things did you get from Evelyn Lincoln?
- Have you ever seen any documentation that explains how Evelyn Lincoln came into possession of any of these things?
- - Then go through them individually
- We're not going to physically obstruct you, but you are under a subpoena - and you leave with them at your peril.

- Authenticity
 - How do we know that everything he's identified on this list is everything that he has?
 - Ted Kennedy Letter (?)
- You are under a continuing obligation to do it?