

## OUTLINE OF ISSUES FOR DEPOSITION OF SIXTH FLOOR MUSEUM

- A. Establish background and credentials of witness to testify regarding the 30(b)(6) subjects identified in our notice of deposition
- B. Determine what search was done to collect records in response to subpoena
- C. Determine whether we have been provided with all available indices to 6th Floor archive records
- D. Identify important, original assassination records in the custody of the 6th Floor Museum
  - Review inventories -- ask about particular entries
  - Dallas Parkland Hospital records
  - Dallas Medical Examiner records
  - Other medical records
  - Jack Ruby court records
  - Records from Dallas law enforcement authorities
  - Motion pictures of events on the day of the assassination
  - Photographs of events on the day of the assassination
  - Audiotapes of events on the day of the assassination
  - Important/unique donations from private individuals
  - Any original records provided to the Warren Commission, HSCA
- E. Establish authenticity of important original records
- F. Establish whether or not 6th Floor museum has legal custody of these records
- G. Determine conditions for public access to important original records, including any restrictions on access

H. Determine which records we should obtain for the JFK Collection