

February 24, 1998

VIA FACSIMILE AND FIRST CLASS MAIL

Robert M. Adler, Esq.  
O'Connor & Hannan  
1919 Pennsylvania Avenue, N.W.  
Suite 800  
Washington, D.C. 20006

Re: Production of Originals Records and Objects Prior to or at Deposition  
of Robert White

Dear Mr. Adler:

I am writing in response to the faxed letter that you sent on February 23 and the discussions that we had following our receipt of your letter. We also appreciate your client's having prepared the "Item Description: Assassination Related Items" that you attached to the February 23 letter. We believe that the lists you have now sent will help substantially in identifying the types of records that we are interested in examining. We further believe that Mr. White's willingness to acknowledge that he does have records that might qualify as assassination records will assist us in arriving at a speedier resolution of the issues.

We have agreed to reset the date of the deposition to Tuesday, March 3, 1998, at 9:30 in our offices. We anticipate that you will be bringing with you the original items that are responsive to our subpoena duces tecum, subject to the agreed limitations that we are continuing to discuss. You have expressed some concern about the Guernsey auction slated for March and the timing of the return to you of originals that may be a part of that auction. Although we cannot necessarily guarantee anything related to the status of records that we have not yet seen, I can advise that it is our current expectation that we will not need to retain possession of any of the original "Guernsey" items for more than a day or two. If you were to make these "Guernsey" items available for our inspection sometime this week, we would anticipate being able to return them to you by the time of the deposition next Tuesday.

I am identifying below the items on the inventories that we wish to examine and those that we currently see no need to examine. Our willingness to limit the scope of our requests is, however, subject to two reservations.

*First*, if Mr. White possesses any additional assassination-related items that were not identified on the inventories, he must still produce them. These would include, of course, items that you identified in your letters to me as well as any other responsive documents. (We are also awaiting Items 161 - 169 from the Guernsey's Consignment List. We requested these items in our February 2, 1998 letter. In your February 4, 1998 response letter, you stated that you would send us these additional items within the next several days. Please make sure to bring these items with you to Mr. White's deposition.)

*Second*, we have determined not to request several of the items based upon their descriptions in the inventories. However, to the extent that your descriptions may not have included relevant information regarding the assassination, those records should nevertheless be produced. For example, you identify several "first-day covers" that contain autographs. You do not need to produce these at the deposition unless -- by way of hypothetical example -- the first-day covers also include handwritten notes that discuss the assassination. Thus, to the extent that the descriptions are reasonably complete and do not omit important information, you do not need to produce the items as identified below.

I will identify the items we are requesting by referring to the item numbers in the inventories that you forwarded to us.

**I. "Item Source: Evelyn & Harold Lincoln & Harold Lincoln Estate"**  
(inventory of 309 items)

***(a) "Lincoln" originals that must be produced prior to or at the deposition***

4-5	59-60	128	193	273
9	75	134-135	225	281
20	93??	138	229-231	294-296
22??	96	142	233	305
24	98-99	144-145	244	308
27	109-110	146	250-251	
30	116	151	258-260	
53	118	172	267	
54	124-126	175	271	

*(b) "Evelyn Lincoln" originals that do NOT need to be produced at the deposition.*

The following originals do not need to be produced *unless* they contain assassination-related information that is not disclosed on the inventory.

1-3	55-58	127		
6-8	61-74	129-133	194-224	272274-280
10-19	76-92	136-137	226-228	282-293
21	94-95	139-141	232	297-304
23??	97	143	234-243	306-307
25	100-108	147-150	245-24	309
26	111-115	152-171	252-257	
28-29	117	173-174	261-266	
31-52	119 to 123	176-192	268-270	

**II. "Item Description: Assassination Related Items"**

(inventory of 80 items)

*(a) "Assassination-Related Items" that must be produced prior to or at the deposition*

7	19	50	59-61
10	21	54	68
12	38	55	75

*(b) "Assassination-Related Items" that do NOT need to be produced prior to or at the deposition*

1-6	13-18	39-49	62	76-80
8-9	20	51-53	63-67	
11	22-37	56-58	69-74	

Robert M. Adler, Esq.

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I hope that this itemization assists you in preparing for the deposition. As always, please do not hesitate to call if you have any questions.

Sincerely,

Kim A. Herd

Senior Attorney