

Synanon

10/21/83

π applied for SC on behalf of both p's

Q's re 8/ order on 11/9 tr.

believe presumption was tr. would be on Bob Jones,  
if ~~it~~ @ all

∫ don't know yet; don't know whether your opposition  
is correct

proceed, ~~so~~ 'til it has opportunity to resolve  
issues framed

other motions outstanding: cross S/S

A's to produce

notes show you ag'd to produce what existed

π yes, & response filed

∫ ag'd to produce what existed

resolved @ Aug. 15<sup>th</sup> SC + dt's Aug. 17 + 23d

orders

still complaining

Δ re destruction - unquestionably true, & dispositive

∫ Brawner's decision to show you  
[to dt.]

∫ any objection?

π ✗

findings made, ✗ dispositive

Δ facts...

∫ don't want to get into it; no time now  
produced what exists

Δ no; that was ag.

π produced what we had

∫ inventory of what had been destroyed

π didn't understand that that was what was sought

∫ heard Fleishman: talked about lost/hidden/destroyed;  
that's what you sought



π the document doesn't exist  
in Brauman's J...

∫ show to D, & to me

π doc's req'd & for discovery but to show that  
they were destroyed

previous lit. showed they don't exist

∫ BT did testify to inventory of destruction

Δ print-out of existing doc's produced is a  
fraud - Brauman so found

US thinks Synanon as a matter of law may  
no longer be entitled to bring this suit

∫ π doesn't ag.

π can we talk about tr? new date?

+ some discovery matters

client has taken office space, moved personnel,

+ it's incurring significant expense

∫ discovery & done?

π stayed last Jan.

∫ off's, & opposed

Δ yes, it was; will check w/ clerk's office to see  
that it gets to chambers

∫ adhere to date for time being

may be some merit to mini-tr., but & decided  
yet

looking @ 1-9(h) states: looks like it will be  
hard to resolve as S/J + matter of law

π & discovery

& time for pre-tr briefs

∫ can't do it in Dec.

probably sched. it after 1<sup>st</sup> of yr.

OK, cancel pre-tr. + tr.



~~7~~  
[ pretr: Jan 6, 10 a.m.  
tr: Jan 9, 10 a.m.  
II enough time for discov.  
A problem on what issues  
stay til issues set  
\* US think violence + destruction are all that's  
@ stake w/ Bob Jones; Symanon disorg's  
II we've never been able to discover on our issue -  
we filed the complaint, per year '73 decision  
of but if A is nt, & need for broad-ranging  
discovery  
II our complaint is equally dispositive  
we want 10 depositions in next 60 days  
political influence will show we're entitled to  
exemptions  
of I recall case - ~~3~~ ~4 docs  
R. 37 case - A failed to comply w/ dt's  
discovery  
will get to you on what issues  
order: produce secreted info.  
any destroyed, inventory  
ruled on BF docs; & going to give g.j. material  
II please notify re discovery  
of course