June 26, 1996

BY FACSIMILE

Mr. Robert Groden
212 Emily Lane
Boothwyn, Pennsylvania 19061

Re: Limitations on Subpoena Duces Tecum for the Production of Documents and Appeaance for Testimony Before the Assassination Records Review Board to Robert Groden

Dear Mr. Groden:

This letter will confirm our June 25, 1996, telephone conversation in which we agreed to limit the scope of the above-reference subpoena. The limitations listed below modify paragraphs one (1) through three (3) of the page headed "Documents and Photographs" that is attached to the subpoena.

Paragraphs one (1) and three (3) remain in force. You are required to bring all to your deposition all materials listed therein.

Paragraph two (2) of the "Documents and Photographs" section is limited as follows:

- You need not bring with you to your deposition images that you have enhanced by the technique you refer to as "rotoscoping" or "Grodenscoping." However, you are required to bring *all* materials that you obtained in your capacity as a consultant to the House Select Committee on Assassinations, *including* "rotoscoped" or "Grodenscoped" materials.

- For each image that you have, even if your copy is not made from an original image, you are required to bring the earliest generation copy you possess. As long as you bring with you the earliest generation copy you possess of each image you possess, you need not bring with you to your deposition *every* copy of each image that you possess.

You are still required to bring with you to your deposition all copies made directly from original films on either film, analog videotape format, or digital videotape format.

The second paragraph of number two remains in force. Again, this portion of the subpoena states that the Review Board will not require you "to bring with you any commercially *published* books, articles, videotapes, or audiotapes (or commercially available research materials) related to the assassination."

As we discussed by telephone, if you have any doubt about whether you should bring something with you to the deposition, you should either bring it or call so that I can answer your question. If you have any additional questions, please feel free to call.

Sincerely,

T. Jeremy Gunn
General Counsel