

NLWJC - Kagan

Counsel - Box 030 - Folder 005

Lawrence Suit: Larry Lawrence [2]

Withdrawal/Redaction Sheet

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
001a. memo	To Elena from Terry re: draft letter (1 page)	08/04/1995	P5
001b. letter	To Mary Anne Silvestri from Terry Henry re: lawsuit (6 pages)	08/07/1995	P5
001c. note	Handwritten note (1 page)	nd	P5
001d. note	Handwritten note (2 pages)	nd	P5
002a. letter	To Richard Riley from Larry M. Lawrence re: position (2 pages)	11/19/1992	P2
002b. resume	re: Larry M. Lawrence (2 pages)	nd	P2
003. note	To John from Terry re: lawsuit (1 page)	06/30/1995	P5
004. note	To John from Terry re: lawsuit (1 page)	06/30/1995	P5
005a. letter	To Richard Riley from Larry M. Lawrence re: position (2 pages)	11/19/1992	P2
005b. resume	re: Larry M. Lawrence (2 pages)	06/27/1995	P2

COLLECTION:

Clinton Presidential Records
 Counsel's Office
 Elena Kagan
 OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
 ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
- b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
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- b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
- b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

Withdrawal/Redaction Marker

Clinton Library

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Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

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Withdrawal/Redaction Marker

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DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
001b. letter	To Mary Anne Silvestri from Terry Henry re: lawsuit (6 pages)	08/07/1995	P5

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

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Elena Kagan
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THE WHITE HOUSE

WASHINGTON

July 13, 1995

MEMORANDUM FOR ALL STAFF OF THE OFFICE OF
PRESIDENTIAL PERSONNEL, THE EXECUTIVE CLERK'S OFFICE
AND RECORDS MANAGEMENT

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

ELENA KAGAN *EK*
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Request for Documents

We have received a request for records related to the appointments of M. Larry Lawrence as Ambassador to Switzerland, and Shelia Lawrence as U.S. Representative to the World Conservation Union.

Please review your records and computer files and provide to **Elena Kagan, Room 125, by 5:00 p.m. on Tuesday, July 18, 1995,** any documents, records (memoranda, correspondence, notes, calendar or journal entries, or phone log entries) or other materials related in any way to the nomination or appointment of M. Larry Lawrence or Shelia Lawrence, including to:

- a) any proposed nomination or appointment for M. Larry Lawrence or Shelia Lawrence in the U.S. Government from 1991 through 1995;
- b) Mr. Lawrence's nomination or appointment as the United States Ambassador to Switzerland; and,
- c) Mrs. Lawrence's nomination or appointment as the U.S. Representative to the World Conservation Union.

To minimize the burden on individual staff members, we will collect any materials responsive to this request that have been forwarded to Records Management. If you have sent such records to Records Management, please alert Terry Good (6-2240) in that Office.

Please contact Elena Kagan at 6-7594 in the Counsel's Office if you have any questions.

THE WHITE HOUSE

WASHINGTON

July 13, 1995

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COUNSEL TO THE PRESIDENT

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SUBPOENA

Superior Court of the District of Columbia

CIVIL DIVISION

500 Indiana Avenue, N.W., Room JM-170
Washington, D.C. 20001 Telephone (202) 879-1133

Initial Amalgamation, Ltd. etc.,
et al.

Plaintiff

SUBPOENA IN A CIVIL CASE

Handwritten signature: Jeffrey B. Holt
JUDGE

v.

DeCastro, West, et al.

Defendant

CASE NUMBER: _____

95 misc 315

DC 083 447

To: Custodian of Records, Office of the Director
of Presidential Personnel, Washington, D.C.
17th & Pennsylvania Avenue, N.W., Washington, D.C.

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify in the above case.

COURTROOM	DATE	TIME
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YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE	TIME
---------------------	------	------

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (*list documents or objects*):

DOCUMENTS OR OBJECTS (SEE ATTACHED)		
PLACE OF PRODUCTION 1827 18th St., NW Capitol Process Services Washington, DC	DATE 8/8/95	TIME 9:30 am

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE	TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. SCR-CIV 30(b)(6).

ISSUING PERSON'S SIGNATURE AND TITLE (indicate if attorney for plaintiff or defendant) Larry D. Sharp - Defendant <i>[Signature]</i>	DATE 7/21/95
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER Larry D. Sharp, Esquire D.C. Bar No. 125351	McGuire, Woods, Battle & Boothe, LLP 1627 I Street, N.W., Suite 1000 Washington, D.C. 20006 (202) 857-1700

(SEE RULE 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE ON REVERSE)

WHITE—ORIGINAL YELLOW—FOR RETURN SERVICE PINK—OFFICE COPY

))

ATTACHMENT TO SUBPOENA

Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Sheila Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland; and any documentation regarding Mrs. Lawrence's nomination and appointment as U.S. Representative to the World Conservation Union.

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MUSICK, PEELER & GARRETT
A LAW PARTNERSHIP
ONE WILSHIRE BOULEVARD
LOS ANGELES, CALIFORNIA 90017-3321
TELEPHONE (213) 629-7600
FACSIMILE (213) 624-1376

William McD. Miller, III (State Bar #48339)
Mary Anne Silvestri (State Bar #97911)

Attorneys for Defendants and Cross-Complainants
DeCASTRO, WEST, CHODOROW & BURNS, INC., and
BRUCE S. GLICKFELD

FILED
LOS ANGELES SUPERIOR COURT
JUL 13 1995
JOHN A. CLARKE, CLERK
B. F. Chin
BY B. F. CHIN, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

INITIAL AMALGAMATION, LTD., a
California limited partnership;
DEL PROPERTIES INCORPORATED, a
California corporation; HOTEL DEL
CORONADO CORPORATION, a California
corporation; THE M. L. LAWRENCE
REVOCABLE TRUST; and M. LARRY
LAWRENCE, an individual,

Plaintiffs,

vs.

DeCASTRO WEST CHODOROW & BURNS,
INC., a professional corporation;
BRUCE S. GLICKFELD, an individual;
and DOES 1 through 50, inclusive,

Defendants.

DeCASTRO, WEST, CHODOROW, INC., A
California corporation; and BRUCE
S. GLICKFELD,

Cross-Complainants,

vs.

SELTZER, CAPLAN, WILKINS &
McMAHON, a Professional Law
Corporation; ROBERT CAPLAN;
STERES, ALPERT & CARNE, a
partnership; ROBERT MCKAY; REBECCA
WOOD;

Case No. BC 083 447

NOTICE OF DEPOSITION OF
CUSTODIAN OF RECORDS, OFFICE
OF THE DIRECTOR OF
PRESIDENTIAL PERSONNEL

DATE: August 8, 1995

TIME: 9:30 a.m.

PLACE: Capitol Process
Services
1827 18th St., N.W.
Washington, D.C.
20009

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Cross-Defendants.)
_____)

TO: EACH PARTY AND ITS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that on Aug. 8 , 1995, the Custodian of Records, Office of the Director of Presidential Personnel, Washington, D.C., will be required to produce documents as set forth in Paragraph 3 of the Deposition Subpena For Production of Business Records, a copy of which is attached hereto.

A subpoena duces tecum will be served on the deponent who will direct the production of the materials described therein.

DATED: July 3, 1995

MUSICK, PEELER & GARRETT

By: Mary Anne Silvestri
Mary Anne Silvestri
Attorneys for Defendants and
Cross-Complainants
DeCASTRO, WEST, CHODOROW &
BURNS, INC., and
BRUCE S. GLICKFELD

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name) (Address) 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017 ATTORNEY FOR (Name): Defendants and Cross-Complainants	TELEPHONE NO (213) 629-7643	FOR COURT USE ONLY
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al. DEFENDANT/RESPONDENT: De Castro, West, et al.		
DEPOSITION SUBPENA For Production of Business Records	CASE NUMBER: BC083447	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name):
 Custodian of Records, Office of the Director of Presidential Personnel, Washington, D.C.

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Capitol Process Services Date: Aug. 8, 1995 Time: 9:30 a.m. Address: 1827 18th Street, NW, Washington, D.C. 20009 (202) 667-0050
--

Do not release the requested records to the deposition officer prior to the date and time stated above.

- by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
 Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;
- Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: June 28, 1995
 Mary Anne Silvestri, Esq.
 (TYPE OR PRINT NAME)

Mary Anne Silvestri
 (SIGNATURE OF PERSON ISSUING SUBPENA)
 Attorneys for Defendants and Cross-Complainants
 (TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.	CASE NUMBER: <div style="text-align: right; font-weight: bold;">BC083447</div>
DEFENDANT/RESPONDENT: De Castro, West, et al.	

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena--Business Records by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e (1) Witness fees were paid.
 Amount:..... \$ _____

(2) Copying fees were paid.
 Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

▶ _____
 (SIGNATURE)

▶ _____
 (SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO THE CUSTODIAN OF RECORDS, OFFICE OF THE DIRECTOR
OF PRESIDENTIAL PERSONNEL

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION UNION.

PROOF OF SERVICE

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STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is MUSICK, PEELER & GARRETT, One Wilshire Boulevard, Suite 2000, Los Angeles, California 90017.

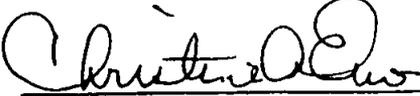
On July 3, 1995, I served the foregoing document described as NOTICE OF DEPOSITION OF CUSTODIAN OF RECORDS, OFFICE OF THE DIRECTOR OF PRESIDENTIAL PERSONNEL on interested parties in this action by placing the true copies thereof enclosed in sealed envelopes addressed as follows:
See Attached Service List.

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on July 3, 1995, at Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Christine A. Enos
Type or Print Name


Signature

SERVICE LIST

Initial Amalgamation, Ltd., et al. v.
DeCastro, West, Chodorow & Burns, Inc., et al.
and Related Cross-Action

Robert S. Draper, Esq.
Gregory R. Oxford, Esq.
O'Melveny & Myers
400 South Hope Street
Los Angeles, CA 90071-2899

Counsel for Plaintiff INITIAL
AMALGAMATION, LTD., DEL
PROPERTIES, INCORPORATED, HOTEL
DEL CORONADO CORP., THE M.L.
LAWRENCE REVOCABLE TRUST, and
M. LARRY LAWRENCE; and Cross-
Defendant TIMOTHY BINDER

Robert G. Steiner, Esq.
Richard R. Spirra, Esq.
Luce, Forward, Hamilton &
Scripps
600 W. Broadway, Suite 2600
San Diego, CA 92101

Counsel for Cross-Defendants
SELTZER, CAPLAN, WILKINS &
MCMAHON and ROBERT CAPLAN

Alan Goldberg, Esq.
Stern & Goldberg
9150 Wilshire Boulevard
Suite 100
Beverly Hills, CA 90212-3414

Counsel for Defendant ROBERT-S.
WEST

Stephen J. Tully, Esq.
Efren Compeán, Esq.
Garrett & Tully
One Colorado
35 Hugus Alley, Suite 300
Pasadena, CA 91103

Counsel for Cross-Defendants
ROBERT MCKAY, REBECCA WOOD, and
the former partnership of
STERES, ALPERT & CARNE

00000000

00000000

SUBPOENA

Superior Court of the District of Columbia

CIVIL DIVISION

500 Indiana Avenue, N.W., Room JM-170
Washington, D.C. 20001 Telephone (202) 879-1133

Initial Amalgamation, Ltd., etc.
et al.

Plaintiff

SUBPOENA IN A CIVIL CASE

For B. H. H. JUDGE

v.

DeCastro, West, et al.

Defendant

CASE NUMBER: 95-misc 315
~~95-083-147~~

To: Bruce Lindsay, in his former capacity as Director and Presidential Personnel
and his current capacity as Asst. to President and Senior Advisor
17th & Pennsylvania Avenue, N.W., Washington, D.C.

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify in the above case.

COURTROOM	DATE	TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE	TIME

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

DOCUMENTS OR OBJECTS		
(SEE ATTACHED)		
PLACE OF PRODUCTION	DATE	TIME
Capitol Process Services 1827 18th St., NW Washington, DC	8/8/95	9:30 am

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE	TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. SCR-CIV 30(b)(6).

ISSUING PERSON'S SIGNATURE AND TITLE (indicate if attorney for plaintiff or defendant)	DATE
Larry D. Sharp - Defendant <i>[Signature]</i>	7/21/95
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER	
Larry D. Sharp, Esquire D.C. Bar No. 125351	McGuire, Woods, Battle & Boothe, LLP 1627 I Street, N.W., Suite 1000 Washington, D.C. 20006 (202) 857-1700

(SEE RULE 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE ON REVERSE)

WHITE—ORIGINAL YELLOW—FOR RETURN SERVICE PINK—OFFICE COPY

ATTACHMENT TO SUBPOENA

Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Sheila Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland; and any documentation regarding Mrs. Lawrence's nomination and appointment as U.S. Representative to the World Conservation Union.

1 MUSICK, PEELER & GARRETT
2 A LAW PARTNERSHIP
3 ONE WILSHIRE BOULEVARD
4 LOS ANGELES, CALIFORNIA 90017-3321
5 TELEPHONE (213) 629-7600
6 FACSIMILE (213) 624-1376

7 William McD. Miller, III (State Bar #48339)
8 Mary Anne Silvestri (State Bar #97911)

9 Attorneys for Defendants and Cross-Complainants
10 DeCASTRO, WEST, CHODOROW & BURNS, INC., and
11 BRUCE S. GLICKFELD

FILED
LOS ANGELES SUPERIOR COURT

JUL 13 1995

JOHN A. CLARKE, CLERK
By *J. Chen*
BY B. F. CHIN, DEPUTY

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES

14 INITIAL AMALGAMATION, LTD., a)
15 California limited partnership;)
16 DEL PROPERTIES INCORPORATED, a)
17 California corporation; HOTEL DEL)
18 CORONADO CORPORATION, a California)
19 corporation; THE M. L. LAWRENCE)
20 REVOCABLE TRUST; and M. LARRY)
21 LAWRENCE, an individual,)

22 Plaintiffs,)

23 vs.)

24 DeCASTRO WEST CHODOROW & BURNS,)
25 INC., a professional corporation;)
26 BRUCE S. GLICKFELD, an individual;)
27 and DOES 1 through 50, inclusive,)

28 Defendants.)

29 DeCASTRO, WEST, CHODOROW, INC., A)
30 California corporation; and BRUCE)
31 S. GLICKFELD,)

32 Cross-Complainants,)

33 vs.)

34 SELTZER, CAPLAN, WILKINS &)
35 McMAHON, a Professional Law)
36 Corporation; ROBERT CAPLAN;)
37 STERES, ALPERT & CARNE, a)
38 partnership; ROBERT McKAY; REBECCA)
39 WOOD;)

Case No. BC 083 447

NOTICE OF DEPOSITION OF
BRUCE LINDSAY, IN HIS FORMER
CAPACITY AS DIRECTOR OF
PRESIDENTIAL PERSONNEL AND
HIS CURRENT CAPACITY AS
ASSISTANT TO PRESIDENT

DATE: August 8, 1995

TIME: 9:30 a.m.

PLACE: Capitol Process
Services
1827 18th St., N.W.
Washington, D.C.
20009

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Cross-Defendants.)
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TO: EACH PARTY AND ITS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that on Aug. 8, 1995, Bruce Lindsay, in his former capacity as Director of Presidential Personnel and his current capacity as Assistant to President, will be required to produce documents as set forth in Paragraph 3 of the Deposition Subpena For Production of Business Records, a copy of which is attached hereto.

A subpoena duces tecum will be served on the deponent who will direct the production of the materials described therein.

DATED: July 3, 1995

MUSICK, PEELER & GARRETT

By: Mary Anne Silvestri
Mary Anne Silvestri
Attorneys for Defendants and
Cross-Complainants
DeCASTRO, WEST, CHODOROW &
BURNS, INC., and
BRUCE S. GLICKFELD

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address) 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017	TELEPHONE NO. (213) 629-7643	FOR COURT USE ONLY
ATTORNEY FOR (Name): Defendants and Cross-Complainants		
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al. DEFENDANT/RESPONDENT: De Castro, West, et al.		
DEPOSITION SUBPENA For Production of Business Records		CASE NUMBER BC083447

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name): Bruce Lindsay, in his former capacity as Director of Presidential Personnel and his current capacity as Asst. to President and Senior Advisor

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Capitol Process Services Date: Aug. 8, 1995 Time: 9:30 a.m. Address: 1827 18th Street, NW, Washington, D.C. 20009 (202) 667-0050
--

Do not release the requested records to the deposition officer prior to the date and time stated above.

- by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;

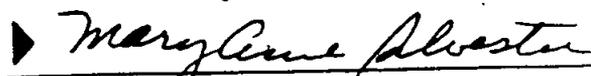
Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: June 28, 1995

Mary Anne Silvestri, Esq.

(TYPE OR PRINT NAME)


SIGNATURE OF PERSON ISSUING SUBPENA

Attorneys for Defendants and Cross-Complainants
(TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc. et al.	CASE NUMBER: BC083447
DEFENDANT/RESPONDENT: De Castro, West, et al.	

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena--Business Records by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.
Amount:..... \$ _____

(2) Copying fees were paid.
Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpena for service on (date):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff, marshal, or constable use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO BRUCE LINDSAY, IN HIS FORMER CAPACITY AS DIRECTOR
OF PRESIDENTIAL PERSONNEL AND CURRENT CAPACITY AS
ASST. TO PRESIDENT AND SENIOR ADVISOR

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND
APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION
UNION.

SERVICE LIST

- Initial Amalgamation, Ltd., et al. v.
DeCastro, West, Chodorow & Burns, Inc., et al.
and Related Cross-Action

Robert S. Draper, Esq.
Gregory R. Oxford, Esq.
O'Melveny & Myers
400 South Hope Street
Los Angeles, CA 90071-2899

Counsel for Plaintiff INITIAL
AMALGAMATION, LTD., DEL
PROPERTIES, INCORPORATED, HOTEL
DEL CORONADO CORP., THE M.L.
LAWRENCE REVOCABLE TRUST, and
M. LARRY LAWRENCE; and Cross-
Defendant TIMOTHY BINDER

Robert G. Steiner, Esq.
Richard R. Spirra, Esq.
Luce, Forward, Hamilton &
Scripps
600 W. Broadway, Suite 2600
San Diego, CA 92101

Counsel for Cross-Defendants
SELTZER, CAPLAN, WILKINS &
McMAHON and ROBERT CAPLAN

Alan Goldberg, Esq.
Stern & Goldberg
9150 Wilshire Boulevard
Suite 100
Beverly Hills, CA 90212-3414

Counsel for Defendant ROBERT'S.
WEST

Stephen J. Tully, Esq.
Efren Compeán, Esq.
Garrett & Tully
One Colorado
35 Hugus Alley, Suite 300
Pasadena, CA 91103

Counsel for Cross-Defendants
ROBERT MCKAY, REBECCA WOOD, and
the former partnership of
STERES, ALPERT & CARNE

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4 PROOF OF SERVICE

5 STATE OF CALIFORNIA
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8 COUNTY OF LOS ANGELES
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10 I am employed in the County of Los Angeles, State of
11 California. I am over the age of 18 and not a party to the within
12 action; my business address is MUSICK, PEELER & GARRETT, One
13 Wilshire Boulevard, Suite 2000, Los Angeles, California 90017.

14 On July 3, 1995, I served the foregoing document
15 described as NOTICE OF DEPOSITION OF BRUCE LINDSAY, IN HIS FORMER
16 CAPACITY AS DIRECTOR OF PRESIDENTIAL PERSONNEL AND HIS CURRENT
17 CAPACITY AS ASSISTANT TO PRESIDENT on interested parties in this
18 action by placing the true copies thereof enclosed in sealed
19 envelopes addressed as follows:
20 See Attached Service List.

21 I am "readily familiar" with the firm's practice of
22 collection and processing correspondence for mailing. Under that
23 practice it would be deposited with U.S. postal service on that
24 same day with postage thereon fully prepaid at Los Angeles,
25 California in the ordinary course of business. I am aware that on
26 motion of the party served, service is presumed invalid if postal
27 cancellation date or postage meter date is more than one day after
28 date of deposit for mailing in affidavit.

Executed on July 3, 1995, at Los Angeles, California.

I declare under penalty of perjury under the laws of the
State of California that the above is true and correct.

25 Christine A. Enos
26 Type or Print Name


Signature

SUBPOENA

**Superior Court of the District of Columbia
CIVIL DIVISION**

500 Indiana Avenue, N.W., Room JM-170
Washington, D.C. 20001 Telephone (202) 879-1133

Initial Amalgamation, Ltd., etc.
et al.

Plaintiff

SUBPOENA IN A CIVIL CASE

Larry D. Sharp
JUDGE

v.

DeCastro, West, et al.

Defendant

CASE NUMBER: 95-083-447

95-083-447

95-083-447

Custodian of Records, Office of the Asst. to President
and Senior Advisor, Bruce Lindsay

To:

17th & Pennsylvania Avenue, N.W., Washington, D.C.

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify in the above case.

COURTROOM	DATE	TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE	TIME

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (*list documents or objects*):

DOCUMENTS OR OBJECTS	DATE	TIME
(SEE ATTACHED)		
PLACE OF PRODUCTION 1827 18th St., NW Capitol Process Services Washington, DC	DATE 8/8/95	TIME 9:30 am

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE	TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. SCR-CIV 30(b)(6).

ISSUING PERSON'S SIGNATURE AND TITLE (indicate if attorney for plaintiff or defendant) Larry D. Sharp - Defendant	<i>Larry D. Sharp</i>	DATE 7/21/95
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER Larry D. Sharp, Esquire D.C. Bar No. 125351	McGuire, Woods, Battle & Boothe, LLP 1627 I Street, N.W., Suite 1000 Washington, D.C. 20006 (202) 857-1700	

(SEE RULE 45, SUPERIOR COURT RULES OF CIVIL PROCEDURE ON REVERSE)

WHITE—ORIGINAL YELLOW—FOR RETURN SERVICE PINK—OFFICE COPY

ATTACHMENT TO SUBPOENA

Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Sheila Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland; and any documentation regarding Mrs. Lawrence's nomination and appointment as U.S. Representative to the World Conservation Union.

1 MUSICK, PEELER & GARRETT
A LAW PARTNERSHIP
2 ONE WILSHIRE BOULEVARD
LOS ANGELES, CALIFORNIA 90017-3321
TELEPHONE (213) 629-7600
3 FACSIMILE (213) 624-1376

FILED
LOS ANGELES SUPERIOR COURT

4 William McD. Miller, III (State Bar #48339)
Mary Anne Silvestri (State Bar #97911)

JM 13 1995

5 Attorneys for Defendants and Cross-Complainants JOHN A. CLARKE, CLERK
DeCASTRO, WEST, CHODOROW & BURNS, INC., and
6 BRUCE S. GLICKFELD. *B. F. Chin*
BY B. F. CHIN, DEPUTY

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10
11 INITIAL AMALGAMATION, LTD., a)
California limited partnership;)
12 DEL PROPERTIES INCORPORATED, a)
California corporation; HOTEL DEL)
13 CORONADO CORPORATION, a California)
corporation; THE M. L. LAWRENCE)
14 REVOCABLE TRUST; and M. LARRY)
LAWRENCE, an individual,)

15 Plaintiffs,)

16 vs.)

17 DeCASTRO WEST CHODOROW & BURNS,)
18 INC., a professional corporation;)
BRUCE S. GLICKFELD, an individual;)
19 and DOES 1 through 50, inclusive,)

20 Defendants.)

21 _____)
DeCASTRO, WEST, CHODOROW, INC., A)
22 California corporation; and BRUCE)
S. GLICKFELD,)

23 Cross-Complainants,)

24 vs.)

25 SELTZER, CAPLAN, WILKINS &)
26 McMAHON, a Professional Law)
Corporation; ROBERT CAPLAN;)
27 STERES, ALPERT & CARNE, a)
partnership; ROBERT MCKAY; REBECCA)
28 WOOD;)

Case No. BC 083 447

NOTICE OF DEPOSITION OF
CUSTODIAN OF RECORDS, OFFICE
OF THE ASSISTANT TO
PRESIDENT AND SENIOR
ADVISOR, BRUCE LINDSAY

DATE: August 8, 1995

TIME: 9:30 a.m.

PLACE: Capitol Process
Services
1827 18th St., N.W.
Washington, D.C.
20009

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Cross-Defendants.)
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TO: EACH PARTY AND ITS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that on Aug. 8, 1995, the Custodian of Records, Office of the Assistant to President and Senior Advisor, Bruce Lindsay, will be required to produce documents as set forth in Paragraph 3 of the Deposition Subpena For Production of Business Records, a copy of which is attached hereto.

A subpoena duces tecum will be served on the deponent who will direct the production of the materials described therein.

DATED: July 3, 1995

MUSICK, PEELER & GARRETT

By: Mary Anne Silvestri
Mary Anne Silvestri
Attorneys for Defendants and
Cross-Complainants
DeCASTRO, WEST, CHODOROW &
BURNS, INC., and
BRUCE S. GLICKFELD

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017 ATTORNEY FOR (Name): Defendants and Cross-Complainants	TELEPHONE NO: (213) 629-7643	FOR COURT USE ONLY
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al. DEFENDANT/RESPONDENT: De Castro, West, et al.		
DEPOSITION SUBPENA For Production of Business Records		CASE NUMBER: BC083447

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name):

Custodian of Records, Office of the Asst. to President and Senior Advisor, Bruce Lindsay

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Capitol Process Services Date: Aug. 8, 1995 Time: 9:30 a.m. Address: 1827 18th Street, NW, Washington, D.C. 20009 (202) 667-0050

Do not release the requested records to the deposition officer prior to the date and time stated above.

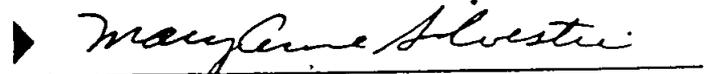
- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
 Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;
- Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY:

Date issued: June 28, 1995

Mary Anne Silvestri, Esq.

(TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPENA)

Attorneys for Defendants and Cross-Complainant
 (TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al. DEFENDANT/RESPONDENT: De Castro, West, et al.	CASE NUMBER: BC083447
---	---------------------------------

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena - - Business Records by personally delivering a copy to the person served as follows:

- a. Person served (*name*):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:
- e. (1) Witness fees were paid.
 Amount:..... \$ _____
- (2) Copying fees were paid.
 Amount:..... \$ _____
- f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional copier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff, marshal, or constable use only)
 I certify that the foregoing is true and correct.

Date:

Date:

▶ _____
 (SIGNATURE)

▶ _____
 (SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO THE CUSTODIAN OF RECORDS, OFFICE OF THE ASSISTANT
TO PRESIDENT AND SENIOR ADVISOR, BRUCE LINDSAY

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND
APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION
UNION.

PROOF OF SERVICE

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STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is MUSICK, PEELER & GARRETT, One Wilshire Boulevard, Suite 2000, Los Angeles, California 90017.

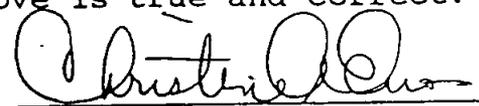
On July 3, 1995, I served the foregoing document described as NOTICE OF DEPOSITION OF CUSTODIAN OF RECORDS, OFFICE OF THE ASSISTANT TO PRESIDENT AND SENIOR ADVISOR, BRUCE LINDSAY on interested parties in this action by placing the true copies thereof enclosed in sealed envelopes addressed as follows: -
See Attached Service List.

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on July 3, 1995, at Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Christine A. Enos
Type or Print Name


Signature

SERVICE LIST

Initial Amalgamation, Ltd., et al. v.
DeCastro, West, Chodorow & Burns, Inc., et al.
and Related Cross-Action

Robert S. Draper, Esq.
Gregory R. Oxford, Esq.
O'Melveny & Myers
400 South Hope Street
Los Angeles, CA 90071-2899

Counsel for Plaintiff INITIAL
AMALGAMATION, LTD., DEL
PROPERTIES, INCORPORATED, HOTEL
DEL CORONADO CORP., THE M.L.
LAWRENCE REVOCABLE TRUST, and
M. LARRY LAWRENCE; and Cross-
Defendant TIMOTHY BINDER

Robert G. Steiner, Esq.
Richard R. Spirra, Esq.
Luce, Forward, Hamilton &
Scripps
600 W. Broadway, Suite 2600
San Diego, CA 92101

Counsel for Cross-Defendants
SELTZER, CAPLAN, WILKINS &
McMAHON and ROBERT CAPLAN

Alan Goldberg, Esq.
Stern & Goldberg
9150 Wilshire Boulevard
Suite 100
Beverly Hills, CA 90212-3414

Counsel for Defendant ROBERT S.
WEST

Stephen J. Tully, Esq.
Efren Compeán, Esq.
Garrett & Tully
One Colorado
35 Hugus Alley, Suite 300
Pasadena, CA 91103

Counsel for Cross-Defendants
ROBERT MCKAY, REBECCA WOOD, and
the former partnership of
STERES, ALPERT & CARNE



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017 Defts. and Cross-Complainants De Castro, West, Chodorow & Burns, Inc. and Bruce S. Glickfeld	TELEPHONE NO: (213) 629-7643	FOR COURT USE ONLY
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.		
DEFENDANT/RESPONDENT: De Castro, West, et al.		
DEPOSITION SUBPENA For Production of Business Records	CASE NUMBER: BC083447	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name):

Custodian of Records, Office of the Asst. to President and Senior Advisor, Bruce Lindsay

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Date: Address:	Capitol Process Services Time:
---	-----------------------------------

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.

3. The records to be produced are described as follows:

Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the United States Ambassador to Switzerland;

Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 6/13/95
 MARY ANNE SILVESTRI
 (TYPE OR PRINT NAME)

▶ Mary Anne Silvestri
 (SIGNATURE OF PERSON ISSUING SUBPENA)
ATTORNEY FOR DEFENDANTS
 (TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.	CASE NUMBER: BC083447
DEFENDANT/RESPONDENT: De Castro, West, et al.	

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena - - Business Records by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:
- e. (1) Witness fees were paid.
Amount:..... \$ _____
- (2) Copying fees were paid.
Amount:..... \$ _____
- f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:
- a. Not a registered California process server.
 - b. California sheriff, marshal, or constable.
 - c. Registered California process server.
 - d. Employee or independent contractor of a registered California process server.
 - e. Exempt from registration under Bus. & Prof. Code section 22350(b).
 - f. Registered professional photocopier.
 - g. Exempt from registration under Bus. & Prof. Code section 22451.
 - h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff, marshal, or constable use only)
I certify that the foregoing is true and correct.

Date:


(SIGNATURE)


(SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO THE CUSTODIAN OF RECORDS, OFFICE OF THE ASSISTANT
TO PRESIDENT AND SENIOR ADVISOR, BRUCE LINDSAY

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION UNION.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017	TELEPHONE NO: (213) 629-7641
ATTORNEY FOR (Name): Defts. and Cross-Complainants De Castro, West, Chodorow & Burns, Inc. and Bruce-S. Glickfeld	
NAME OF COURT: Los Angeles County Superior Court	
STREET ADDRESS: 111 N. Hill Street	
MAILING ADDRESS:	
CITY AND ZIP CODE: Los Angeles, California 90012	
BRANCH NAME: Central District	
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.	
DEFENDANT/RESPONDENT: De Castro, West, et al.	
DEPOSITION SUBPENA For Production of Business Records	CASE NUMBER: BC083447

TO: James Castello

From: Bruce Lindsay

file: Suits Against POTUS
John Rogovin
fax: 514-8071

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name): Bruce Lindsay, in his former capacity as Director of Presidential Personnel and current capacity as Asst. to President and Senior Advisor

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Capitol Process Services	Date:	Time:
Address:		

Do not release the requested records to the deposition officer prior to the date and time stated above.

- by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;

Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 6/13/95

MARY ANNE SILVESTRI
(TYPE OR PRINT NAME)

Mary Anne Silvestri
(SIGNATURE OF PERSON ISSUING SUBPENA)
ATTORNEY FOR DEFENDANTS
(TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.	CASE NUMBER: BC083447
DEFENDANT/RESPONDENT: De Castro, West, et al.	

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena - - Business Records by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.
Amount:..... \$ _____

(2) Copying fees were paid.
Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpena for service on (*date*):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff, marshal, or constable use only)
I certify that the foregoing is true and correct.

Date:

Date:

▶ _____
(SIGNATURE)

▶ _____
(SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO BRUCE LINDSAY, IN HIS FORMER CAPACITY AS DIRECTOR
OF PRESIDENTIAL PERSONNEL AND CURRENT CAPACITY AS
ASST. TO PRESIDENT AND SENIOR ADVISOR

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION UNION.

THE WHITE HOUSE
WASHINGTON
COUNSEL'S OFFICE
FACSIMILE TRANSMISSION COVER SHEET

DATE: June 26, 1995

TOTAL PAGES (INCLUDING COVER PAGE): 4

TO: Department of Justice
 ATTN: John Rogovin
 FACSIMILE NUMBER: 514-8071
 TELEPHONE NUMBER: 514-5421
 FROM: James E. Castello at (202) 458-6611
 COMMENTS: _____

PLEASE DELIVER AS SOON AS POSSIBLE

The document(s) accompanying this facsimile transmittal sheet is intended only for the use of the individual or entity to whom it is addressed. This message contains information which may be privileged, confidential or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any disclosure, dissemination, copying or distribution, or the taking of any action in reliance on the contents of this communication is strictly prohibited. If you have received this information in error, please immediately notify the sender at their telephone number stated above.

TRANSMISSION REPORT

THIS DOCUMENT (REDUCED SAMPLE ABOVE)
WAS SENT

**** COUNT ****
4

*** SEND ***

NO	REMOTE STATION I. D.	START TIME	DURATION	#PAGES	COMMENT
1	202 514 8071	6-26-95 15:53	2'22"	4	

TOTAL 0:02'22" 4

THE WHITE HOUSE

WASHINGTON

COUNSEL'S OFFICE

FACSIMILE TRANSMISSION COVER SHEET

DATE: June 26, 1995

TOTAL PAGES (INCLUDING COVER PAGE): 4

TO: Department of Justice

ATTN: John Rogovin

FACSIMILE NUMBER: 514-8071

TELEPHONE NUMBER: 514-5421

FROM: James E. Castello at (202) 456-6611

COMMENTS: _____

PLEASE DELIVER AS SOON AS POSSIBLE

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THE WHITE HOUSE
WASHINGTON

June 19, 1995

MEMORANDUM FOR BOB NASH, ASSISTANT TO THE PRESIDENT AND
DIRECTOR OF PRESIDENTIAL
PERSONNEL
CHERYL MILLS, ASSOCIATE COUNSEL TO THE
PRESIDENT

FROM: Vanessa Weaver, Director of Information Systems, PPO
Ana Duque, Staff Assistant for Correspondence, PPO

RE: Deposition Subpeona regarding Larry M. Lawrence

Our office received the attached Deposition Subpeona today. We contacted Records Management and it seems that they have a large volume of documents pertaining to Mr. Lawrence. According to our database, his appointment to the position of Amabassador to Switzerland was handled by John Emerson in June of 1993. We have attached the information that was scanned into Resumix. If the information from Records Management is needed, we can obtain it. Please advise on how to proceed.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017		TELEPHONE NO.: (213) 629-7643	FOR COURT USE ONLY
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		ATTORNEY FOR (Name): Defts. and Cross-Complainants De Castro, West, Chodorow & Burns, Inc. and Bruce-S. Glickfeld	
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.		DEFENDANT/RESPONDENT: De Castro, West, et al.	
DEPOSITION SUBPENA For Production of Business Records		CASE NUMBER:	BC083447

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name):

Custodian of Records, Office of the Director of Presidential Personnel, Washington, D.C.

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name): Capitol Process Services
Date: _____ Time: _____
Address: _____

Do not release the requested records to the deposition officer prior to the date and time stated above.

- by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;

Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 6/13/95

..... MARY ANNE SILVESTRI
(TYPE OR PRINT NAME)

▶ Mary Anne Silvestri
(SIGNATURE OF PERSON ISSUING SUBPENA)
ATTORNEY FOR DEFENDANTS
(TITLE)

(See reverse for proof of service)

DEPOSITION SUBPENA - - BUSINESS RECORDS

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO THE CUSTODIAN OF RECORDS, OFFICE OF THE DIRECTOR
OF PRESIDENTIAL PERSONNEL

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION UNION.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
002a. letter	To Richard Riley from Larry M. Lawrence re: position (2 pages)	11/19/1992	P2

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
- b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
- b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
- b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
- b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
- b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
- b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
002b. resume	re: Larry M. Lawrence (2 pages)	nd	P2

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
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- b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
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- b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

file: lawsuits against PATS



**U. S. Department of Justice
Office of the Attorney General**

Associate Deputy Attorney General

Washington, D.C. 20530

DATE: June 30, 1995

TO: James Castello
White House

Telephone No. () 456 - 6611 Fax No. () 456 - 6279

FROM: Seth P. Waxman
Associate Deputy Attorney General

Telephone No. (202) 514 - 4560 Fax No. (202) 514 - 9368

TRANSMISSION CONTAINS 2 SHEETS INCLUDING THIS COVERSHEET

SPECIAL NOTE(S) Please deliver ASAP.
James - Attached is the current status of the Lawrence/Lindsey
subpoenas.

WARNING: Many fax machines produce copies on thermal paper. The image produced is highly unstable and will deteriorate significantly in a few years. It should be copied on a plain paper copier prior to filing as a record.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
003. note	To John from Terry re: lawsuit (1 page)	06/30/1995	P5

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
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THE WHITE HOUSE
WASHINGTON

July 13, 1995

MEMORANDUM FOR ALL STAFF OF THE OFFICE OF
PRESIDENTIAL PERSONNEL, THE EXECUTIVE CLERK'S OFFICE
AND RECORDS MANAGEMENT

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

ELENA KAGAN
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Request for Documents

We have received a request for records related to the appointments of M. Larry Lawrence as Ambassador to Switzerland, and Shelia Lawrence as U.S. Representative to the World Conservation Union.

Please review your records and computer files and provide to Elena Kagan, Room 125, by 5:00 p.m. on Tuesday, July 18, 1995, any documents, records (memoranda, correspondence, notes, calendar or journal entries, or phone log entries) or other materials related in any way to the nomination or appointment of M. Larry Lawrence or Shelia Lawrence, including:

- a) any proposed ~~or current~~ nomination or appointment for M. Larry Lawrence or Shelia Lawrence in the U.S. Government ~~during the time period of~~ 1991 through 1995; ^{to}
- b) Mr. Lawrence's nomination or appointment as the United States Ambassador to Switzerland; and,
- c) Mrs. Lawrence's nomination or appointment as ^{the} U.S. Representative to the World Conservation Union.

To minimize the burden on individual staff members, we will collect any materials responsive to this request that have been forwarded to Records Management. If you have sent such records to Records Management, please alert Terry Good (6-2240) in that Office.

Please contact Elena Kagan at 6-7594 ⁹ in the Counsel's Office if you have any questions.

Ask Cheryl -

Needed to go to a few other people.

John Emerson.

THE WHITE HOUSE
WASHINGTON

July ~~10~~¹³, 1995

MEMORANDUM FOR ALL STAFF OF THE OFFICE OF
PRESIDENTIAL PERSONNEL, THE EXECUTIVE CLERK'S OFFICE
AND RECORDS MANAGEMENT

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

~~CHERYL MILLS~~ ELENA KAGAN
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Request for Documents

We have received a request for records related to the appointments
of M. Larry Lawrence, ^{as} Ambassador to Switzerland, and Shelia
Lawrence, ^{as} U.S. Representative to the World Conservation Union.

Please review your records and computer files and provide to ^{to Elena Kagan, Room 125,}
~~Cheryl Mills, Room 128,~~ By 5:00 p.m. on ~~Thursday, July 13,~~ ^{Tuesday,} 1995,
any documents, records (memoranda, correspondence, notes,
calendar or journal entries, or phone log entries) or other
materials related in any way to the appointment of M. Larry
Lawrence or Shelia Lawrence, including ^{to} nomination or

- ^{or current nomination or}
- a) any proposed ~~or current~~ appointment for M. Larry
Lawrence or Shelia Lawrence in the U.S. Government
during the time period of 1991 through 1995;
 - b) ~~any documentation regarding~~ Mr. Lawrence's nomination
^{or} and appointment as the United States Ambassador to
Switzerland; and,
 - c) ~~any documentation regarding~~ Mrs. Lawrence's nomination
^{or} and appointment as U.S. Representative to the World
Conservation Union.

To minimize the burden on individual staff members, we will
collect any materials responsive to this request that have ^{been}
forwarded to Records Management. If you have sent such records
to Records Management, please alert Terry Good (6-2240) in that
Office. ←

Elena Kagan at 6-7594

Please contact ~~Cheryl Mills,~~ at ~~6-7900,~~ in the Counsel's Office
if you have any questions.

THE WHITE HOUSE
WASHINGTON

COUNSEL'S OFFICE

FACSIMILE TRANSMISSION COVER SHEET

DATE: 6/30/95

TOTAL PAGES (INCLUDING COVER PAGE): 2

TO: Counsel's Office

ATTN: Cheryl Mills

FACSIMILE NUMBER: 6-1647

TELEPHONE NUMBER: 6-5111

FROM: James Castello at (202) 456-6611

COMMENTS:

Cheryl - - this is the update on
the subpoena that you passed on to me
from Presidential Personnel

James

PLEASE DELIVER AS SOON AS POSSIBLE

The document(s) accompanying this facsimile transmittal sheet is intended only for the use of the individual or entity to whom it is addressed. This message contains information which may be privileged, confidential or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any disclosure, dissemination, copying or distribution, or the taking of any action in reliance on the contents of this communication is strictly prohibited. If you have received this information in error, please immediately notify the sender at their telephone number stated above.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
004. note	To John from Terry re: lawsuit (1 page)	06/30/1995	P5

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
- b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
- b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
- b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
- b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
- b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
- b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]



U.S. Department of Justice
Civil Division

Washington, D.C. 20530

DEPARTMENT OF JUSTICE
CIVIL DIVISION
FAX TRANSMITTAL COVER SHEET

DATE: June 27, 1995

TO: Cheryl Mills
Assoc. Counsel to the President

FAX NUMBER: 456-1647

FROM: Terry Henry, Federal Programs Branch
TELEPHONE: (202) 514-4107
PRIMARY FAX: (202) 616-8202 (9th Floor)
ALTERNATE FAX: (202) 616-8460 (8th Floor)
(202) 616-8470 (10th Floor)

THERE ARE A TOTAL OF 15 PAGES, INCLUDING THIS COVER SHEET, IN THIS TRANSMISSION.

Cheryl, as discussed, please find attached copies of the 3 subpoenas I know of and related materials.

The information contained in this facsimile message is confidential and is intended only for the use of the addressee. If you are not the addressee or the agent or employee of the addressee, you are hereby notified that any duplication or distribution of this communication is unauthorized. If you have received this message in error, please notify us at once.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017 TELEPHONE NO. (213) 629-7643		FOR COURT USE ONLY
ATORNEY FOR (Name): Defts. and Cross-Complainants De Castro, West, Chodorow & Burns, Inc. and Bruce S. Glickfeld NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al. DEFENDANT/RESPONDENT: De Castro, West, et al.		
DEPOSITION SUBPENA For Production of Business Records		CASE NUMBER: BC083447

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name):

Custodian of Records, Office of the Asst. to President and Senior Advisor, Bruce Lindsey

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3 as follows:

Deposition Officer (name):	Capitol Process Services
Date:	Time:
Address:	

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:

Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the United States Ambassador to Switzerland;

Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 6/13/95

MARY ANNE SILVESTRI
(TYPE OR PRINT NAME)

Mary Anne Silvestri
(SIGNATURE OF PERSON ISSUING SUBPENA)
ATTORNEY FOR DEFENDANTS
(TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.	CASE NUMBER
DEFENDANT/RESPONDENT: De Castro, West, et al.	BC083447

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena - -Business Records by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.
Amount:..... \$ _____

(2) Copying fees were paid.
Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff, marshal, or constable use only)
I certify that the foregoing is true and correct.

Date:

▶ _____
(SIGNATURE)

▶ _____
(SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO THE CUSTODIAN OF RECORDS, OFFICE OF THE ASSISTANT
TO PRESIDENT AND SENIOR ADVISOR, BRUCE LINDSAY

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION UNION.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address) 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017 Datta, and Cross-Complainants De Castro, West, Chodorov & Burns, Inc. and Bruce S. Glickfeld	TELEPHONE NO: (213) 629-7643	FOR COURT USE ONLY
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al. DEFENDANT/RESPONDENT: De Castro, West, et al.		
DEPOSITION SUBPENA For Production of Business Records	CASE NUMBER: BC083447	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name): Bruce Lindsay, in his former capacity as Director of Presidential Personnel and current capacity as Asst. to President and Senior Advisor

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3 as follows:

Deposition Officer (name): Capitol Process Services Date: _____ Time: _____ Address: _____
--

- Do not release the requested records to the deposition officer prior to the date and time stated above.
- by delivering a true, legible, and durable copy of the business records described in Item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - by delivering a true, legible, and durable copy of the business records described in Item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1583(b).
 - by making the original business records described in Item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1583(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1581.
3. The records to be produced are described as follows:
 Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;
- Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 6/13/95

..... MARY ANNE SILVESTRI
 (TYPE OR PRINT NAME)

..... *Mary Anne Silvestri*
 (SIGNATURE OF PERSON ISSUING SUBPENA)

..... ATTORNEY FOR DEFENDANT'S
 (TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.	CASE NUMBER: BC083447
DEFENDANT/RESPONDENT: De Castro, West, et al.	

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena -- Business Records by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.

Amount:..... \$ _____

(2) Copying fees were paid.

Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpena for service on (date):

3. Person serving:

a. Not a registered California process server.

b. California sheriff, marshal, or constable.

c. Registered California process server.

d. Employee or independent contractor of a registered California process server.

e. Exempt from registration under Bus. & Prof. Code section 22350(b).

f. Registered professional photocopier.

g. Exempt from registration under Bus. & Prof. Code section 22461.

h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff, marshal, or constable use only)
I certify that the foregoing is true and correct.

Date:

Date:

(SIGNATURE)

(SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO BRUCE LINDSAY, IN HIS FORMER CAPACITY AS DIRECTOR
OF PRESIDENTIAL PERSONNEL AND CURRENT CAPACITY AS
ASST. TO PRESIDENT AND SENIOR ADVISOR

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND
APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION
UNION.

THE WHITE HOUSE
WASHINGTON

June 19, 1995

MEMORANDUM FOR BOB NASH, ASSISTANT TO THE PRESIDENT AND
DIRECTOR OF PRESIDENTIAL
PERSONNEL
CHERYL MILLS, ASSOCIATE COUNSEL TO THE
PRESIDENT

FROM: Vanessa Weaver, Director of Information Systems, PPO
Ana Duque, Staff Assistant for Correspondence, PPO

RE: Deposition Subpeona regarding Larry M. Lawrence

contacted already?

Our office received the attached Deposition Subpeona today. We contacted Records Management and it seems that they have a large volume of documents pertaining to Mr. Lawrence. According to our database, his appointment to the position of Amabassador to Switzerland was handled by John Emerson in June of 1993. We have attached the information that was scanned into Resumix. If the information from Records Management is needed, we can obtain it. Please advise on how to proceed.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): 97911 Mary Anne Silvestri, Esq. MUSICK, PEELER & GARRETT One Wilshire Blvd., Suite 2200 Los Angeles, California 90017		TELEPHONE NO: (213) 629-7643	FOR COURT USE ONLY
NAME OF COURT: Los Angeles County Superior Court STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District		DEFENDANT/RESPONDENT: De Castro, West, et al.	
PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.		CASE NUMBER: BC083447	
DEPOSITION SUBPENA For Production of Business Records			

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name):
 Custodian of Records, Office of the Director of Presidential Personnel, Washington, D.C.

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3 as follows:

Deposition Officer (name): Capitol Process Services	Date:	Time:
Address:		

- Do not release the requested records to the deposition officer prior to the date and time stated above.
- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
 Any and all documents relating to any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence by the U.S. Government during the time period 1991 through 1995, including, but not limited to, any lists of potential candidates for appointment by the U.S. Government; any documentation regarding Mr. Lawrence's nomination and appointment as the U.S. Ambassador to Switzerland;
- Continued on attachment 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **6/13/95**

.....**MARY ANNE SILVESTRI**.....
 (TYPE OR PRINT NAME)

Mary Anne Silvestri
 (SIGNATURE OF PERSON ISSUING SUBPENA)
ATTORNEY FOR DEFENDANTS
 (TITLE)

(See reverse for proof of service)

DEPOSITION SUBPENA - - BUSINESS RECORDS

Code of Civil Procedure, § 1020, 2025
 Government Code § 68097.1

PLAINTIFF/PETITIONER: Initial Amalgamation, Ltd., etc., et al.

CASE NUMBER

BC083447

DEFENDANT/RESPONDENT: De Castro, West, et al.

PROOF OF SERVICE OF DEPOSITION SUBPENA--BUSINESS RECORDS

1. I served this Deposition Subpena - - Business Records by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.
Amount:..... \$ _____

(2) Copying fees were paid.
Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff, marshal, or constable.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Bus. & Prof. Code section 22451.
- h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff, marshal, or constable use only)
I certify that the foregoing is true and correct.

Date:

Date:

(SIGNATURE)

(SIGNATURE)

ATTACHMENT 3 TO DEPOSITION SUBPENA
TO THE CUSTODIAN OF RECORDS, OFFICE OF THE DIRECTOR
OF PRESIDENTIAL PERSONNEL

AND ANY DOCUMENTATION REGARDING MRS. LAWRENCE'S NOMINATION AND APPOINTMENT AS U.S. REPRESENTATIVE TO THE WORLD CONSERVATION UNION.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
005a. letter	To Richard Riley from Larry M. Lawrence re: position (2 pages)	11/19/1992	P2

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
- b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
- b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
- b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
- b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
- b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
- b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
005b. resume	re: Larry M. Lawrence (2 pages)	06/27/1995	P2

COLLECTION:

Clinton Presidential Records
Counsel's Office
Elena Kagan
OA/Box Number: 8291

FOLDER TITLE:

Lawrence Suit: Larry Lawrence [2]

2009-1006-F
ry933

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

C. Closed in accordance with restrictions contained in donor's deed of gift.

PRM. Personal record misfile defined in accordance with 44 U.S.C. 2201(3).

RR. Document will be reviewed upon request.

Freedom of Information Act - [5 U.S.C. 552(b)]

- b(1) National security classified information [(b)(1) of the FOIA]
- b(2) Release would disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA]
- b(3) Release would violate a Federal statute [(b)(3) of the FOIA]
- b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
- b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
- b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
- b(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

THE WHITE HOUSE

WASHINGTON

July 15, 1995

519-4107

MEMORANDUM FOR ALL STAFF OF THE OFFICE OF
PRESIDENTIAL PERSONNEL, THE EXECUTIVE CLERK'S OFFICE
AND RECORDS MANAGEMENT

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

CHERYL MILLS
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Request for Documents

We have received a request for records related to the appointment of M. Larry Lawrence, Ambassador to Switzerland, and Shelia Lawrence, U.S. Representative to the World Conservation Union.

Please review your records and computer files and provide to Cheryl Mills, Room 126, By 5:00 p.m. on Monday, July 10, 1995, any documents, records (memoranda, correspondence, notes, calendar or journal entries, or phone log entries) or other materials related in any way to the appointment of M. Larry Lawrence or Shelia Lawrence, including:

- a) any proposed or current appointment for M. Larry Lawrence or Shelia Lawrence in the U.S. Government during the time period of 1991 through 1995;.
- b) any documentation regarding Mr. Lawrence's nomination and appointment as the United States Ambassador to Switzerland; and,
- c) any documentation regarding Mrs. Lawrence's nomination and appointment as U.S. Representative to the World Conservation Union.

To minimize the burden on individual staff members, we will collect any materials responsive to this request that have forwarded to Records Management. If you have sent such records to Records Management, please alert Terry Good (6-2240) in that Office.

Please contact Cheryl Mills, at 6-7900, in the Counsel's Office if you have any questions.

THE WHITE HOUSE

WASHINGTON

July 5, 1995

MEMORANDUM FOR ALL ~~STAFF AND FORMER STAFF~~ ^{CURRENT} OF THE OFFICE OF
PRESIDENTIAL PERSONNEL, THE EXECUTIVE CLERK'S OFFICE
AND RECORDS MANAGEMENT

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

CHERYL MILLS
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Request for Documents

We have received a request for records related to the appointment of M. Larry Lawrence, Ambassador to Switzerland and Shelia Lawrence, U.S. Representative to the World Conservation Union.

Please review your records and computer files and provide to Cheryl Mills, Room 128, By 5:00pm, on Monday, July 10, 1995, any documents, records (memoranda, correspondence, notes, calendar or journal entries, or phone log entries) or other materials related in any way to the appointment of M. Larry Lawrence or Shelia Lawrence, including:

- a) any proposed ^{or} current appointment for M. Larry Lawrence and Shelia Lawrence in the U.S. Government during the time period of 1991 through 1995;
- b) any documentation regarding Mr. Lawrence's nomination and appointment as the United States Ambassador to Switzerland; and
- c) any documentation regarding Mrs. Lawrence's nomination and appointment as U.S. Representative to the World Conservation Union.

To minimize the burden on individual ~~White House Office~~ ^{staff} members, we will collect any materials responsive to this request that have forwarded to Records Management. If you have sent such records to Records Management, please alert Terry Good (6-2240) in that Office.

Please contact Cheryl Mills, at 6-7900, in the Counsel's Office if you have any questions.

THE WHITE HOUSE
WASHINGTON

July 3, 1995

MEMORANDUM FOR ALL STAFF ^{AND FORMER STAFF} OF THE OFFICE OF PRESIDENTIAL PERSONNEL
~~AND THE EXECUTIVE OFFICE OF THE PRESIDENT~~

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

CHERYL MILLS
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: ^{Request for} ~~Subpoena of Documents~~

We have received a request for records related to the appointment of M. Larry Lawrence, Ambassador to Switzerland, at _____ (tue) Monday,

Please review your records and computer files and provide to Cheryl Mills, Room 128, By 5:00pm on ~~XXXXXX~~ on July XX, 1995, and documents, records (memoranda, correspondence, notes, calendar or journal entries, or phone log entries) or other materials related in any way to M. Larry Lawrence or Sheila Lawrence, including:

a) ^{documents related to} any proposed or current appointment for M. Larry Lawrence and Shelia Lawrence ⁱⁿ by the U. S. Government during the time period of 1991 through 1995, ^{the appointment of} including, but not limited to, any lists of potential candidates for appointment by the U.S. Government;

b) any documentation regarding Mr. Lawrence's nomination and appointment as the United States Ambassador to Switzerland; and

c) any documentation regarding Mrs. Lawrence's nomination and appointment as U.S. representative to the world conservation union.

Each Assistant or Deputy Assistant to the President with supervisory responsibility for an office is responsible for ensuring the adequacy of searches within their offices.

To minimize the burden on individual White House Office members, we will collect any materials responsive to this request that have forwarded to Records Management. If you have sent such records to Records Management, please alert Terry Good (6-2240) in that Office.

Please contact Cheryl Mills, at 6-7900, in the Counsel's Office if you have any questions.