files some of this material to fall back on in case we needed it as part of a defense mechanism, but I can comment further that this plan was not implemented.

To my best recollection, we never went ahead and compiled or made such a compilation.

MR. McGOWAN: We can skip my designations on page 36.

MR. SMITH: 53.

MR. McGOWAN: Your Honor, just one moment. We are trying to skip a lot of this, and we are working together here.

THE COURT: Okay.

(Whereupon, pause.)

MR. McGOWAN: We can skip to 48, line 23.

Thank you for your patience, Your Honor. We are skipping a lot of pages.

Line 23.

BY MR. McGOWAN:

Q I am going to show you an exhibit, which I will later mark for identification.

A This is a nine-page memorandum dated June