

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

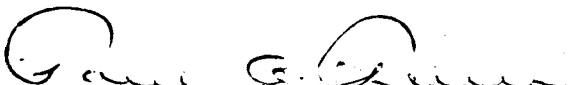
UNITED STATES OF AMERICA,)
Plaintiff)
vs.)
STATE OF ALABAMA, GEORGE)
PENTON, MRS. SAMUELLA P.)
WILLIS, Registrars of)
Voters of Montgomery,)
Alabama)
Defendants)

CIVIL ACTION NO. 1741-N

MOTION TO LIMIT EXAMINATION
PURSUANT TO FED. R. CIV. P. 30(b)

Comes now the United States, by its attorney, and moves this Court, pursuant to Rule 30 (b) of the Federal Rules of Civil Procedure, for an order that defendant be not allowed, on the taking of the depositions of Messrs. Spencer H. Robb and John C. McCluney, Special Agents, Federal Bureau of Investigation, pursuant to subpoenas served by defendants on September 1, 1961, and September 7, 1961, respectively, to make inquiries which would reveal the identity of individuals who have given statements, either oral or written, concerning racially discriminatory acts and practices in voter registration in Montgomery County, Alabama, on the ground that such inquiry would reveal the identity of informants of the Federal Bureau of Investigation and would constitute an intrusion into the "work product" of plaintiff's attorneys, or to make inquiry as to the contents of any statements, reports, or memoranda on the ground that such inquiry would circumvent the requirement of Rule 34 of the Fed. R. Civ. P. that good cause must be shown for the production of documents in the possession, custody, or control of the plaintiff, and would constitute an intrusion into the "work product" of the plaintiff's attorneys.

Done, this the 13th day of September, 1961.


Paul A. Renne

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FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff)

vs.)

CIVIL NO. 1741-N)

STATE OF ALABAMA, GEORGE)
PENTON, MRS. SAMUELLA F.)
WILLIS, Registrars of)
Voters of Montgomery,)
Alabama)
Defendants)

NOTICE OF MOTION

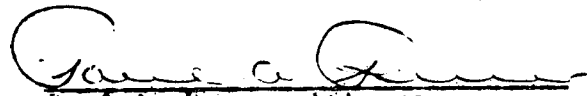
SEP 13 1961

R. C. DODSON
Clerk

TO: William F. Thetford
Attorney for Defendant
Circuit Solicitor
Room 303
County Courthouse
Montgomery, Alabama

By:
Docket Clerk

Please take notice that the undersigned will bring the
above motion on for hearing before this Court, United States
Court House, Montgomery, Alabama, on the 13th day of September,
1961, at 2:00 o'clock in the afternoon of that day or as soon
thereafter as counsel can be heard.



Paul A. Renne, Attorney
United States Department of Justice

*Service of the within papers made on me this
the 13 day of Sept 1961*

William F. Thetford