1 MR. DAVIS: I think we were introduced before.
2 My name is Richard Davis and with me is Judy Denny. The
3 area of inquiry that we are going to focus on involves the
4 investigation that has been conducted relating to an
5 eighteen and a half minute gap in a recording of a
6 conversation between yourself and Mr. Haldeman on June 20,
7 1972.
8 According to your daily diaries which were made
9 available in connection with the hearings in front of
10 Judge Sirica, that meeting took place approximately from
11 11:25 a.m. to 12:45 p.m., and in the course of asking
12 questions it should be always assumed when I refer to the
13 June 20 Haldeman conversation, it is to that conversation
14 to which I am referring.
15 To begin, I would --
16 THE WITNESS: If I could ask one question there. This
17 is just for information only. This matter of the eighteen
18 and a half minute gap I know Judge Sirica considered to be
19 his dish of tea and he had it all wiped around in open
20 court. Is this a matter that the Grand Jury is already
21 familiar with, or is the Grand Jury now investigating it?
22 I mean, it is perfectly all right, but I just wanted to know
23 because the masses of material you sent to me, naturally you
24 didn't send me any Grand Jury testimony because I have no
25 more right to see it than any other citizen, but the material

AUTHENTICATED
U.S. GOVERNMENT
INFORMATION
GPO

1 you sent to me was all before Sirica in open court.

2 MR. DAVIS: You should be advised that in January, I

3 believe, January of 1974, at the conclusion of the hearings

4 in front of Judge Sirica, Judge Sirica referred the matter

5 for investigation by the Grand Jury and the Grand Jury has

6 been investigating the matter.

7 THE WITNESS: And the Grand Jury has heard the same

8 witnesses that Judge Sirica had in open court.

9 MR. DAVIS: Of course, I cannot describe the exact

10 witnesses. I think it should be safely assumed --

11 THE WITNESS: All right, all right, I have enough.

12 You have been investigating it. That's fine. I just want to

13 be sure the Grand Jury has everything that Judge Sirica

14 has.

15 MR. DAVIS: We are hopeful they have more.

16 I would like to begin by having marked as

17 Exhibit No. B-1 which I will show to you, a copy of the

18 subpoena which was issued in July, 1973, by the Grand Jury

19 requesting certain tapes.

20 (The document referred to was
marked Exhbit No. B-1 for
21 identification.)

22 THE WITNESS: You are interested in item 1-A, is that

23 correct?

24 MR. DAVIS: That is correct, but just as a general

25 matter, did you at the time this subpoena was served attempt

1 to focus on the content of the conversations? I am not
2 asking for the content, I am just asking whether you
3 attempted to focus or determine what had been said in the
4 various conversations which are listed in the subpoena
5 which is before you?
6 THE WITNESS: No, I don't recall having done so.
7 I just took a quick look at the magnitude of the subpoena
8 and, incidentally, at this point I should also say that we,
9 as you know, were contesting the process in court. You are
10 talking about at the time it was delivered. We had no
11 intention of, frankly, complying unless the court should so
12 find and we thought maybe we could win in court, but we
13 didn't.
14 MR. DAVIS: We are aware of that, and basically the
15 question really is just as a preliminary matter to find out
16 whether around the time the subpoena that was served you
17 made an effort either through your own recollection or by
18 checking other materials to learn what was said in the
19 various conversations referred to in the subpoena.
20 THE WITNESS: If you are talking about this particular
21 time, I don't recall focusing particularly. I should point
22 out, however, that on the 4th of June that, as you are
23 aware, because it has been publicly testified to, I under-
24 stand, I listened to the, what I think were the Oval Office
25 tapes with Mr. Dean and consequently if I saw the subpoena

1 and saw Dean's conversation on it, I would have assumed
2 that I had heard it.
3 There was one section, however, that I didn't,
4 that I have never listened to, and I hope I don't have to
5 listen to any more tapes. Any of you who have gone through
6 that agony -- I hope you won't have to either, particularly
7 the EOB ones, but I didn't listen to the June 21 one.
8 I saw Mr. Haldeman had notes on that and I relied on his
9 notes.
10 BY MR. DAVIS:
11 Q When you say June 21, you refer to June 20?
12 A No, I am sorry, March 21. But I did not listen
13 at that time to this tape. That was not made available to
14 me.
15 Q "This tape," that is referring to the June 20th
16 tape.
17 A The one you are interested in, yes. It is 1-A.
18 MR. DAVIS: To have in front of you, in case you
19 want to refer to it in connection with the next few
20 questions, I would like to mark as Exhibit B-2 what evidence
21 has indicated are Mr. Haldeman's notes of his conversation
22 with you on June 20, which we are inquiring about.
23 (The document referred to was
24 marked Exhibit No. B-2, for
25 identification.)
BY MR. DAVIS:

1 Q I also will tell you --

2 A Incidentally, I would hope you would get a better

3 duplicating machine. These are very hard to read, the ones

4 you sent out to me.

5 Q I think you are probably aware the problem we

6 faced making copies of copies, which are probably original-

7 ly copied ten times over when we received them.

8 A I am not criticizing them, but if the Grand Jury

9 would like to see, even with glasses it is hard to read,

10 particularly when it is somebody else's writing.

11 Q Keeping in mind also that there is also some

12 evidence which indicates that the meeting on June 20 between

13 yourself and Mr. Haldeman was the first face-to-face

14 meeting between yourself and Mr. Haldeman which took place

15 after the burglary into the Democratic National Headquarters

16 on June 17th --

17 A No, no, and I don't mean to interrupt a question,

18 but I think it is very important to be sure that a

19 question is not based on assumption that is totally

20 incorrect. When you said this was the first face-to-face

21 meeting I had with Mr. Haldeman, it was the first meeting

22 I may have had in the White House, but you see the break-in

23 occurred when I was in Florida and I rode with Mr. Haldeman

24 back from Florida and, therefore -- and my plane is an

25 office and I saw him on that occasion, too. I want to be

1 sure the Grand Jurors know I talked to him on several
2 occasions before June 20th.
3 Q We stand corrected. The first meeting back in
4 Washington then I think would be more accurate in terms of
5 stating the evidence.
6 A Well, the reason I think it is important, in
7 terms of the evidentiary matter, is that the content is
8 perhaps of interest. If this is the first meeting, it becomes
9 extremely much more important. Well, I guess it is
10 unimportant in your investigation. You want to find out what
11 happened with the tape, so you can go ahead with your
12 question.
13 Q Do you now recall anything about what was said in
14 the conversation?
15 A What was said in this conversation?
16 Q That is right.
17 A No, I do not.
18 Q Do you recall whether at the time the litigation was
19 going on involving these tapes during the summer and fall
20 of '73, whether at that time you had a recollection as to
21 what was in the conversation which was called for in that
22 subpoena?
23 A This specific conversation?
24 Q Yes.
25 A No, I have no recollection of what was in this

1 specific conversation.

2 Q For example, page 2 of the notes which have

3 been marked as Exhibit B-2 refer to what is our counter-

4 attack, PR's offensive to top this and other items that

5 you may see there.

6 Do you recall whether in this period that

7 subject was being discussed by you and Mr. Haldeman?

8 A Now when you say "during this period," let me

9 qualify it by saying that I learned about this in Florida.

10 I saw Mr. Haldeman there and we rode back on the plane

11 together. I saw him on the plane, and of course we discussed

12 this to be terribly wrong, and also in my opinion utterly

13 stupid activity, and from reading his notes I am sure all

14 of these subjects were discussed, but as far as their being

15 discussed at that time, I have no recollection whatever of

16 it being discussed at that time.

17 I mean, for example, the bugging of our own

18 place, the EOB office and other offices immediately came

19 to my attention.

20 Q And there you are referring to the note in

21 Exhibit B-2 which says be sure EOB offices thoroughly

22 checked re bugged at all times, et cetera, is that correct?

23 A Could I -- if I could tell you why it appears in

24 these notes, because in 1962 when I was running for Governor,

25 we had been bugged, we found later, by Governor Brown, a

very good, personal friend of mine. I don't mean that he probably authorized it, but his people bugged us. We were wondering why everything was getting out and we finally found a bug. In 1968, for example, we learned that not only was President and Vice President Agnew's plane under surveillance, and he himself was under surveillance by the FBI, but that the FBI was at one point directed to bug my plane. There are differing versions as to whether they did or did not do it. Mr. Hoover once told me that they did. But others have indicated that this was not carried out.

I want to point out that simply the fact that this stupid act occurred in Florida was not the only reason that I raised the problem of the bugging here because I knew that it was a common practice by the other side and they were experts at it, and I have been bugged at the congressional campaign -- I mean the gubernatorial campaign, even my plane possibly, at least ordered to be bugged this time by a Government agency, not by a campaign committee in 1968, and I consequently was very sensitive on the subject.

Q Do you recall whether anything was said in this conversation which related to the role of anyone in approving or knowing about the break-in or electronic surveillance prior to June 17, apart from Messrs. Liddy, Hunt, McCord and the four gentlemen from Miami?

A No, again you have made an assumption in your

1 question that I will have to qualify. You said did I recall
2 anything that was said in this conversation. I have already
3 said I do not recall this conversation at all. I have no
4 independent recollection of it.
5 Q So is it fair to say that you don't recall
6 whether anything in this conversation touched on the subject
7 matter that I just referred to?
8 A I don't recall the conversation at all, as I have
9 indicated.
10 Q Do you recall whether during the summer of 1973,
11 following the issuance of the subpoena and the start of
12 litigation, you had any conversation with Mr. Buzhardt or
13 General Haig as to why the various items had been
14 subpoenaed, and specifically why this item had been
15 subpoenaed?
16 A I don't recall. I probably had conversations
17 with, particularly Mr. Buzhardt, the counsel, as to the
18 purpose of the subpoena. I don't recall it independently
19 though.
20 Q I am talking not so much about the general
21 purpose of the subpoena, but as to why the particular con-
22 versation that we are talking about here, the June 20
23 conversation, had been selected as part of the subpoena?
24 A No, I recall no conversation of that sort. As
25 to why I would pick that one out over something else, I don't

1 know.

2 Q Now as has been testified in Judge Sirica's

3 court and in those hearings, the week end of September 29

4 Miss Woods began listening to and transcribing various

5 tapes. Without focusing on the dates specifically, but just

6 focusing on whatever point she began that project, before

7 she began that task, had you listened to the recording

8 of your meeting with Mr. Haldeman on June 20th?

9 A I think really we can cut short a lot of time,

10 and I understand that you need to ask the question several

11 times to be sure I always answer it the same way, but you

12 said or you have asked me now for the fourth time have I

13 listened to the recording of June 20th. I told you that I

14 did not listen to the recording of June 20, and I repeat it

15 again. If you want to ask it again, we can go all day

16 on it.

17 Q I believe the earlier question was as to

18 whether you now recollect what was in the conversation.

19 A No. I don't mean to argue with counsel, because

20 having sometimes been on the other side of the table as

21 a congressman, you do sometimes come back to the same

22 question without intending to be repetitive, but I am

23 pointing out I have never heard this conversation that you

24 have alluded to, this so-called eighteen and a half minute

25 gap, and I add in that period I did not listen to the

1 conversation which you have alluded to, this tape. This
2 tape was not in my possession. I didn't have possession of
3 it. It didn't come into my possession before and I have
4 never had it in my possession.
5 The point is that -- let me say, when I talk
6 about a tape being in my possession, I have noted from the
7 records here that various people have indicated that among
8 those who had access to the tapes was the President at all
9 times. What I am saying is to the best of my recollection --
10 I didn't even recall where they were kept -- to the best of
11 my recollection, unless they were obtained by somebody else
12 and brought to me for the purpose of listening, I have no
13 recollection of ever having heard this particular tape that
14 you refer to. And in checking the record, I find that, or I
15 should say my counsel, I guess, checked the records -- I
16 hope they have -- I find no indication that this tape was
17 ever checked out to me.
18 Q In your response you said unless someone took
19 the tape and brought it to you to listen. I just want to
20 cover that base. Do you recall any situation where
21 somebody brought you the June 4 tape to listen to?
22 A Oh, yes, June 4, as I told you.
23 Q Focusing on this tape --
24 A On this tape, no, I don't recall at any time that
25 anybody brought this tape to me to listen to. I don't

1 recall it.

2 Q At any point did you review, and generalizing

3 the time period now to perhaps save some time, did you

4 review any personal notes that you might have had which

5 referred to what had taken place during this meeting? Do

6 you know if any such notes exist?

7 A No, I don't know. Not having reviewed them,

8 obviously I wouldn't know whether any existed.

9 Q But that is in terms of reviewing them recently,

10 and my question really goes to reviewing them in 1973 and

11 1974, and I take it your answer would be that you don't

12 recall reviewing any such notes.

13 A Yes -- you mean personal notes other than what

14 you have put in evidence here?

15 Q That is correct.

16 A No.

17 Q Now do you recall whether or not you gave Miss

18 Woods any instructions as to what she should do in

19 connection with listening to the tapes and making whatever

20 kind of transcript she could?

21 A Well, actually I didn't ask her to make trans-

22 cripts. The purpose of this, as you may recall, was that

23 we had decided that we would try to work out a compromise

24 with the Special Prosecutor and with the Senate Investigating

25 Committee whereby Senator Stennis would agree to listen to all

of the tapes and then furnish any relevant material with regard to Watergate to the people involved, and thereby protect the principle of executive privilege. That compromise was agreed to by everybody concerned and enthusiastically supported, incidentally, by Mr. Richardson, among others. He later changed his mind because Mr. Cox disagreed, and you know the consequences that followed from that.

So the purpose of this exercise was to get, basically, what I would refer to as the gist of what was on the tapes to see what parts of the tapes should be thoroughly then transcribed, if they were relevant, and that was Miss Woods' job that I thought she would be able to do in two or three days.

I must indicate, incidentally, why I thought she might be able to do it much faster than she eventually did do it. I mentioned that I listened to the tapes on June 4. If you will look at that list, you will find that they were virtually all tapes with Mr. Dean in the Oval Office, and if you, Mr. Ruth, have listened to the tapes, and you have, you will note that the Oval Office tapes can be heard fairly well. Also telephone tapes can be heard well. Tapes in the EOB office are virtually impossible to hear on occasion, and in fact I question some of the EOB transcripts, not because by any deliberate intent on the parts of

1 the individuals preparing them but because they are
2 impossible to hear, those that some of you will be
3 questioning me on later today or maybe tomorrow.
4 But to come to your question, yes, Miss Woods
5 was directed to go to Camp David, where it would be quiet,
6 she would be away from the phones and we also wanted it to
7 be done without a great deal of publicity. Mr. Bull was to
8 go with her and the purpose was to get the gist of what were
9 called then the nine subpoenaed conversations.
10 Q To make sure I understand correctly, at the point
11 that Miss Woods was given this assignment, it was in
12 connection with preparing for the compromise that you have
13 referred to?
14 A Yes, that is my recollection, yes.
15 Q Now, while you were --
16 A Let me point out we hadn't closed the deal as
17 far as the compromise was concerned, but we thought that
18 that was the best way to proceed and we had to explore that
19 as an option, and that was why we were doing it.
20 Q Now you have referred to Miss Woods going to
21 Camp David to begin this process, and I would like to turn
22 to that period now briefly. Do you recall -- the records
23 indicate that it is September 29.
24 A Yes, I understand. I have looked at some of
25 these logs that you have prepared and in order to make your

1 work easier, just ask me about it and if I don't I will ask
2 for it. So I appreciate your suggestion that he show it
3 to me. All right, September 22 is the date.
4 Q While at Camp David, do you recall the incident
5 of your going over to the cabin where Miss Woods was
6 listening and working on the tapes?
7 A Miss Woods had gone up earlier in the
8 morning, had driven up. I had a very busy morning that day,
9 Chancellor Brandt, and a few other people, so I came up later
10 in the day and I was hopeful that she had made some
11 progress, and I did go over from Aspen, I walked -- it is
12 about a hundred feet over to Dogwood. Incidentally, Dogwood
13 is now famous because that is where Mr. Breschnev stayed.
14 Aspen, of course, is the Presidential cabin. I walked over
15 to Dogwood where Miss Woods and Mr. Bull were and walked
16 into the cabin and asked her how are you coming along.
17 She had been there three or four hours, because
18 I was there -- I don't know -- mid-afternoon at some time.
19 MR. DAVIS: If you like, we can mark as Exhibit B-3
20 a copy of your daily diary for that date, which I think we
21 suggested that your counsel review with you before this
22 testimony. But why don't we have it now in front of you
23 because you would like to refer to it.
24 (The document referred to was
25 marked Exhibit No. B-3,
for identification.)

1 THE WITNESS: My counsel furnished you this?

2 MR. DAVIS: I think this was furnished in 1973 in

3 connection with the tapes hearings and we furnished it back,

4 in essence, suggesting that it would be relevant to this

5 investigation.

6 THE WITNESS: Incidentally, I know we can't go off

7 the record, so don't take this down, please. Please don't

8 let it out that I saw Senator Percy. Goldwater would be

9 right down my throat.

10 Now we are back on the record. I realize we

11 can't go on and off, but you have to have a little lift out

12 of life here. I was amazed that I had seen him that day.

13 So was he amazed.

14 All right, I have the diary.

15 Q Do you recall whether or not you listened to what-

16 ever tape Miss Woods was working on at that time?

17 A Well, when I walked in she said, as I

18 recall, that she was having a terrible time getting it off.

19 She didn't know how she could possibly finish this work, and

20 she had only three or four pages, as I recall -- I can't

21 say, it could have been eight or ten -- but three of four

22 pages of notes she had typed out. She said, you should

23 listen to this thing and you will see what I mean. So I put

24 the earphone on and I listened to the tape and she, she

25 was -- I listened to it the day before, I imagine, two or three

1 minutes and I could see the problem. I don't recall or
2 have any recollection whatever what I heard. I just recall
3 that the tape was of extraordinary bad quality, you couldn't
4 tell whether one person or two or three might be talking at
5 times. There were noises, outside noises, inside noises and
6 I just shook my head, and I said, well, do the best you can
7 and let me know at the end of the day how you are getting
8 along.

9 Q Do you recall anything else about that, your
10 visit with Miss Woods over at the cabin, other than what you
11 have just testified to?

12 A Well, assuming that the log is right, --
13 obviously I am refreshing my recollection here -- assuming
14 the log was right, how long was I there -- seven minutes --
15 I think that the conversation dealt only with that, with the
16 problem she was having in getting it done. That is all that
17 I can recall.

18 Q Now in these early stages when Miss Woods was
19 beginning this process and before any conversation Miss
20 Woods may have had with you about any erasure she may have
21 made of a portion of any tape --

22 A I just don't like that word, but go ahead.

23 Q -- do you recall any conversation, other
24 conversations you had with her about the tapes and, for
25 example, the diary shows on September 29 that you met with

1 her on other occasions, but just generally do you recall
2 any other conversations?
3 A Well, of course at this time -- well, while her
4 primary responsibilities were tapes, she also had other
5 responsibilities as well. She came over to dinner, as you
6 note. I had her over earlier to see what she had produced
7 up to that time, and it was very little. I could see that
8 the problem was very, very difficult. At some time in that
9 day she told me, and I can't fix the time -- I don't
10 recall it specifically -- she said, thank God I only have to
11 do about an hour of this rather than, you know, the whole
12 day, because she apparently had, she said, received a call
13 from Washington -- I don't think she told me who it was
14 from -- that only the Ehrlichman portion of the tape or the
15 portion where Ehrlichman -- the portion in which Ehrlichman
16 was present was subpoenaed and that, from reading the log,
17 you got the impression it was a little shorter than she
18 anticipated otherwise.
19 Q Have you previously discussed that question with
20 General Haig or Mr. Buzhardt?
21 A I have no recollection of discussing it
22 previously. It is possible we could have discussed it
23 previously, as to how much of that was, but I don't know how
24 it would have come up. Apparently, I note from the materials
25 that your office has furnished to my counsel, General Haig

1 initiated a call to Miss Woods and said Cox has made a
2 mistake on the subpoena and on Item No. 1 you need only that
3 portion of the conversation in which Ehrlichman is present,
4 and she apparently had typed it off. She told me about
5 that at some time when we were there over the week end,
6 that that is all she had to do.
7 Q But prior to that time you don't recall your
8 having any conversation with General Haig or Mr.Buzhardt
9 about what was included within the item?
10 A I don't recall. I might have had, but I don't
11 recall the conversation.
12 MR. DAVIS: I am going to ask that this be marked as
13 Exhibit No. B-4.
14 (The document referred to was
15 marked Exhibit No. B-4,
16 for identification.)
17 THE WITNESS: There was a discussion at some time, and
18 I don't know when it occurred, but my recollection is it
19 was at this time, that it was a sloppily drawn subpoena.
20 This is no reflection on you, because this thing had been
21 going on so long that probably you were still in high school
22 at the time.
23 MR. DAVIS: I wish that were true.
24 THE WITNESS: Certainly you were. So in any event,
25 that was a sloppily drawn subpoena, but my best recollection

1 is that occurred after I learned from Miss Woods that Haig
2 had called her and said Cox has said you have to only do
3 this part or that you only have to do the part in which
4 Ehrlichman is talking.
5 BY MR. DAVIS:
6 Q Referring you to the front page, there is some
7 evidence that that is a notation made by probably Mr. Bull
8 some time during the week end at Camp David. I am going to
9 direct your attention to the portion which says, "Haldeman"
10 paren, after Dash, "at" and possibly says, to be fair,
11 "RN's request."
12 My question is, do you recall ever making any
13 specific request of Miss Eoods or to Mr. Bull that the Haldeman
14 portion be listened to and summarized by Miss Woods?
15 A No, I have no recollection of that. On the
16 contrary, I was very anxious for her to get the job done and
17 I wanted her to do just as much as was required, but no
18 more, and to listen to no more than was subpoenaed. I
19 don't know what that meant. I don't recall it. It does
20 not refresh any recollection of mine.
21 Q Did Miss Woods report to you or give you any
22 indication at any time, really, as to what was the content
23 of any portion of your conversation with Mr. Haldeman on
24 June 20th?
25 A That is a very general question. Did she at any

1 time ever tell me what was the content of the conversa-
2 tion?
3 Q With Mr.Haldeman?
4 A The only thing that Miss Woods ever told me
5 about the conversation with Mr. Haldeman was about those
6 portions that existed and that she had listened to. She
7 said, apparently, something about scheduling, et cetera.
8 Q Is the conversation that you are referring to
9 essentially the one which took place when Miss Woods reported
10 to you the buzz which existed on the tape?
11 A Yes, I think -- well, she didn't tell me about
12 it at Camp David because she hadn't reached that point. I
13 know that she did not bring me over, as was the practice, as
14 she finished any one of the tapes she would bring me over
15 what she had done. While she was at Camp David, the reason
16 she would come over, I would just tell her, well, bring
17 what you have got, because I wanted to see how long the
18 project is going to take, but when she came in, I think the
19 transcript shows that that was on Monday, October 1, is that
20 correct?
21 Q That is correct.
22 A You are asking about that conversation?
23 Q I was asking more generally and was intending to
24 get to the October 1 conversation in a few moments.
25 A Yes. Well, you have asked a general question.

Q That is right.

A Well, let me get to a specific answer then. With regard to the time when the Haldeman portion of the conversation became an issue, the first time it became an issue was on October 1. While I was at Camp David, I have no recollection whatever of hearing even Haldeman's voice. Incidentally, I wouldn't swear it was Ehrlichman's either. It did turn out to be, from the content thereafter, and at times I wonder what I had had to drink that day when I heard my own voice. This is such a bad tape.

The Grand Jury should be rewarded by letting them listen to it. But, in any event, it was incredible, but Miss Woods came in in the afternoon of the first of October and she was very distraught. She told me that she had made some kind of a mistake. She did not describe it. I said, what kind of a mistake? Where was it?

She said, well, she said, I was trying to find if Ehrlichman was still around and I was listening to Haldeman, and she did not go into any details. As you will note from the log, the conversation was very brief. And I said, are you sure you were just listening to Haldeman, and she said, yes. She said, there was some kind of discussion about scheduling, and she did mention something about Ely, Nevada, which rang a bell with me, and then she said, I heard a buzz. And I said, well, if it was just the

1 Haldeman thing, there is nothing to be worried about, forget
2 it, because it is not subpoenaed.
3 I said, as far as the Ehrlichman part, you
4 finished all of that, which she had, and she said, "Yes, all
5 of that is done," and I said, "That is what they want.
6 As far as this part, any mistake that has been made, there
7 is no problem.
8 Q Did she indicate to you the length of the buzz?
9 A She said it was very brief, very brief.
10 Q Did she go into any kind of detail as to what had
11 caused the buzz?
12 A No.
13 Q Or what she thought might have caused the buzz?
14 A No. My recollection here is that, only that she
15 said -- first, that she was distraught; second, that there was
16 some,that she made some reference to getting a telephone call.
17 Q But you didn't ask her how it happened?
18 A I know very little about such machinery, even
19 though I had operated one at Newport, but, nevertheless, I was
20 more interested in whether or not, frankly, evidentiary
21 subpoenaed materials were involved.
22 (Individual enters room and stated as follows:)
23 " It is important, sir, we have to do it. "
24 THE WITNESS: Is this going to help you. This is an
25

1 anti-coagulant.

2 I think it should be recorded, I am taking

3 anti-coagulants ordered by the doctors every day at twelve

4 o'clock. That means that if I am ever in an accident and

5 start to bleed I will bleed to death unless the doctor is

6 there within ten minutes.

7 Want one?

8 All right, on the record.

9 BY MR. DAVIS:

10 Q Do you recall, after Miss Woods made this report

11 to you, and perhaps you would like to have in front of you

12 the copy of the daily diary for October 1, which is marked

13 as B-5.

14 Q I think I have it, October 1.

15 MR. DAVIS: I think you have September 29. We will

16 mark as B-5 the one of October 31, which I again should

17 state for the record was supplied in July, 1973, in

18 connection with the litigation.

19 (The document referred to was

20 marked Exhibit No. B-5,

21 for identification.)

22 THE WITNESS: That's all right. I know you wouldn't,

23 I mean, surreptitiously get them out. That is only done by

24 people that aren't either in the Special Prosecutor's

25 office or my office -- maybe not even in Mr. Miller's

office.

Now, what is your question about this particular matter?

BY MR. DAVIS:

Q It is just to put that in front of you, and I am going to ask whether you recall after Miss Woods made this report to you, do you recall what you did in connection with that report to contact Mr. Ziegler, Mr. Buzhardt or General Haig in any connection?

A No, as far as Mr. Ziegler was concerned, I did not talk to him about it at all.

Mr. Ziegler, and here I have to speculate in answering because I noticed I requested that he come over -- is that he would come over after his daily briefing. He also had an appointment every day to give me a report on the briefing. There was no discussion at all with him. I also noticed I talked to Mr. Rebozo. I most certainly didn't talk to him about that. But we go into that this afternoon, what we talk about, and then it notes that I talked with Mr. Haig.

Now I would say that this would indicate that I did not have a great deal of concern about what Miss Woods had done, but in the meeting with Mr. Haig I mentioned to him the fact that Miss Woods was having a terrible time with the tapes and that she just had made what she called a mistake

1 on a portion of the Haldeman thing, and he recalled clearly
2 that he had had, apparently based on a conversation he had
3 with Mr. Buzhardt, informed Miss Woods on the 29th or
4 28th -- whenever she went to Camp David -- that the
5 Haldeman portion of the tape was not subpoenaed, so he said,
6 no problem.
7 Q During this period, do you recall, and I would
8 say this would be prior to the change of position when it was
9 was decided that the June 20th Haldeman conversation was
10 included within the subpoena, prior to that taking place
11 do you recall whether you had any conversation with Mr.
12 Buzhardt about what Miss Woods had reported to you?
13 A Well, I don't recall specifically a conversation
14 with Mr. Buzhardt, but I would say that Mr. Haig, General
15 Haig, would certainly not have told Miss Woods that a certain
16 portion of the tape was not subpoenaed unless he consulted
17 with Mr. Buzhardt, and it is very possible that I talked
18 with Buzhardt about it, too, but I can't independently
19 recall it at this time.
20 Q On October 31, 1973, hearings began before
21 Judge Sirica regarding the reported non-existence of two
22 other subpoenaed tapes and Miss Woods testified in those
23 hearings on November 8. Do you recall whether you had any
24 conversations with her about this time which related to her
25 testimony in the sense of relating to any problem that this

1 accident might --

2 A This is her first appearance?

3 Q This is her first appearance, yes, sir.

4 A Before answering that question, for the benefit

5 of the members of the Grand Jury, since they will be seeing

6 this log--I mean if I were in your position, and I am sure

7 you have thought of this, what in the world was I spending

8 that much time with Haig for. I spent twenty minutes with

9 him, and then I apparently -- we spent over an hour and a

10 half in the car. I mean, the presumption, if I were

11 questioning, frankly -- I am not trying to help you do a job

12 on anybody, but my point is you want the truth, and we were

13 having very, very long discussions,and this may explain one

14 of the reasons Haig didn't get there any sooner than he

15 did, but that is when we had the Agnew crisis, and I

16 remember that long drive in the country. That is when we

17 decided that Mr. Agnew had to go then. He didn't go then,

18 but he went later.

19 I know what that conversation was about, but I

20 just wanted you to know it wasn't about this thing. Neither

21 Haig nor I thought it was a problem at all, based on the fact

22 that it was not subpoenaed, and we thought, too, it was

23 just a technical matter, and we were thankful it hadn't

24 happened on something that had been subpoenaed.

25 Q To move to Miss Woods, when she testified at the

first set of hearings, do you recall whether you had any conversations with Miss Woods about her testimony?

A No, I don't recall that I talked to her about her testimony.

We had a practice in our office, and I think it is probably the practice in most President's offices -- I hope it is -- it is even now, and it was a practice in the Eisenhower administration I know -- the President has got so many, many very, very important things to do -- I mean, I am not trying to build up myself, but all Presidents have -- that wherever possible you don't raise matters with him that are going to divert him from the job he was elected to do.

For example, you take Mr. Bull. I was rather shocked to learn, when he left -- Mr. Bull, who is no target of this investigation, incidentally, as I understand --

Q I must say that we can't, obviously, respond to that.

A I know you can't but you wouldn't be committed to it in any event, but he shouldn't be, I am sure, because I have known him a long time, Mr. Bull, who sits right outside my office and Miss Woods' office is down the hall a ways, and he had FOIA(b)6 in attorney's fees when he left Government.

I said, how come? He said, because I have had to go down and testify so much.

1 I said, I didn't know you were down there. I
2 mean, I didn't know you were down there that much. I knew
3 he had been down, but he never came in to talk to me about
4 his testimony; he never came in to bother me about his
5 testimony, or to ask me about it, and Miss Woods, above all,
6 followed that practice, because she had been with me for twenty-
7 seven years, and she knew that I had -- it is probably one
8 of the weaknesses, but it is one of the weaknesses I have and
9 it is a strength in another way, I am quite single-
10 minded. Some people can play cards and listen to television
11 and have a conversation at one time. I can't. I do one
12 thing at a time, and in the office of the Presidency I did
13 the big things and did them reasonably well and screwed up on
14 the little things, partly because the staff didn't bring
15 them to me.
16 They didn't think it was big either. But I have
17 taken too long to answer the question. What I am going to say
18 is, no, I didn't discuss Miss Woods conversation with her.
19 I have no recollection of a discussion with her as to how she
20 should testify, what she would do. I knew she was worried
21 about it. I knew she was going down, but --
22 Q Do you recall any conversations with Mr.
23 Buzhardt or General Haig in connection with how Miss Woods
24 might respond to questions during this first hearing which
25 might somehow involve her accidental erasure that had been

1 reported to you?

2 A Assuming it was accidental, right.

3 You see, I am helping you now.

4 Q Do you recall any such conversation with Mr.

5 Haig or with Mr. Buzhardt?

6 A I don't recall a conversation. One could have

7 occurred. I don't recall any. And I emphasize again that

8 the reason that I don't -- I think my recollection in this

9 instance, which,of course,is just pure recollection, is

10 correct, because I don't have access to any notes or

11 anything of that sort in this period, because I didn't

12 consider it a problem. Haig didn't consider it a problem.

13 Buzhardt didn't consider it a problem that time, and I don't

14 believe, for that reason, that they would have brought it up

15 to me around that period of time, October 1, 1973, when we

16 had some pretty rugged problems.

17 Q Now with the exception of some isolated times when

18 Mr. Bull had the tape, the June 20th tape, largely for

19 purposes of transporting it, the evidence indicates generally

20 that between September 29, 1973, and November 13, 1973,

21 when all the original tapes Miss Woods had were returned to

22 General Bennett, that this tape that we have been talking

23 about was in her custody. Do you recall whether during that

24 entire time period you ever went into Miss Woods' office

25 when she was working on this tape, apart from you talked about

1 the Camp David incident?

2 A No, I have no recollection of that.

3 Let me point out that at the time we had our

4 conversation on October 1, she was finished with this tape.

5 She was finished with the October 1st tape.

6 I am sorry, with the June 20th tape on October

7 first, and I only say that, but in direct response to your

8 question, the answer is I had no reason to go into her

9 office. I would have her come into mine if I felt there was

10 something to be done.

11 Q Now during this period she worked on these

12 tapes in Key Biscayne also, and I mean to include that in the

13 following question:

14 Do you recall ever being present when Miss Woods

15 was working on the tapes at all, apart from the September 29

16 visit to Dogwood cabin?

17 A So that you can get the geographical situation in

18 mind, my house at Key Biscayne is over at the bay. The hotel

19 where the staff stays is over on the seaside, about two

20 miles away. I never visited on this trip. While I have been

21 to the hotel on other occasions, on this trip I never went

22 to Miss Woods' quarters, where she stayed, General Haig,

23 Bull, the Secret Service, and the rest.

24 Q My question was a little broader. I was

25 including that, but in terms of that entire period, whether

1 it was Key Biscayne or at the White House or the EOB, were
2 you ever present on any other occasion, apart from the Camp
3 David experience, when Miss Woods was actually working on
4 the tapes?
5 A On the tapes?
6 Q On the nine tapes?
7 A Or this tape?
8 Q The tapes generally?
9 A The tapes generally. Being in her office when
10 she was typing them off, you mean, or something like that?
11 Q Well, when she had the tapes out and was listen-
12 ing or typing?
13 A I don't have any recollection. Not in Florida,
14 certainly, because the tapes were always over there in her
15 apartment. They were never brought over to me, and as far
16 as her office in Washington is concerned, when she returned
17 from Florida, I have no recollection of walking in to look
18 at the tape process because I, frankly, wanted her to get the
19 job done and I didn't think we ought to bother her.
20 Q Do you recall generally what the first awareness
21 you had wasthat there was a buzzing sound or other kind of
22 gap of greater dimensions than was reported to you by Miss
23 Woods in the earlier conversation?
24 A Here I am testifying because, as far as the date
25 is concerned, on the basis of having my memory refreshed

1 from the documents that you have furnished to me, I know
2 that I was informed of it, of course, as far as the date is
3 concerned. It was in the middle of October.
4 Q I would suggest that it was, in terms of the
5 documents we have produced to you, that there is testimony
6 that it was in the middle of November.
7 A You are exactly right, the middle of November.
8 I appreciate your correcting me, because it shows you how
9 you can slip back and forth. It was the middle of
10 November. It was after Miss Woods had testified for the first
11 time before the Grand Jury -- I mean, before Mr. Sirica,
12 who was even tougher than the Grand Jury, but anyway --
13 Q Do you recall how it was brought to your
14 attention or who brought it to your attention?
15 A Who --
16 Q Do you recall who brought to your attention the
17 fact that there was a gap of larger dimension than Miss Woods
18 had reported?
19 A General Haig. General Haig. My recollection is
20 clear on that. I don't recall which office I was in, but
21 he came in and said that, you know, about this tape, that
22 we find that -- I mean, Rose had thought it was four minutes, or
23 something like that, or there had been some discussion,
24 which was very brief, and now the counsel have found that it
25 is eighteen and a half minutes, and I practically blew my

1 stack, and I said, why, what business has counsel gotten
2 to this. This tape she was told was not subpoenaed; they
3 changed their minds, and he said, well, I guess they have.
4 I said, well, let's take another look then. I said, we have
5 done enough to damage the Presidency already by agreeing to
6 turn over confidential information, and I am not going to
7 turn over anything that is not absolutely required by the
8 subpoena.

9 I also, frankly, told Buzhardt that when I talked
10 to him about it, that I said I want an absolute check to make
11 sure that we weren't discussing a non-subpoenaed tape.

12 Q And did Mr. Buzhardt give you that assurance,
13 or do you recall anything further about the conversation with
14 Mr. Buzhardt?

15 A No, I don't recall. Over those days, you will
16 note from the logs, I was traveling some. In November,
17 and that was another rather interesting period, too, the
18 period you remember of the confirmation of Mr. Ford was on
19 my mind, and so forth, but in any event Mr. Buzhardt, to
20 shorthand it, only said that talking with the other lawyers,
21 Garment and all, that they agreed that despite the fact that
22 it was a sloppily drawn subpoena, that actually the Haldeman
23 portion of the conversation, as well as the Ehrlichman
24 portion, was subpoenaed.

25 Now when I was told that finally -- I think

however, my recollection is that it occurred just after I had addressed the Governors' Conference. If you will check the logs and pull out the dates, I would appreciate it, but I addressed the Governors' Conference in Kansas City, I think it was, and one of the governors asked me is there any other bombshell going to come.

I said I didn't think so. I was aware at that time of this eighteen and a half minute thing, but I was still not convinced that, and had still not made up my mind that it was subpoenaed, so under the circumstance I said I hope not.

Then after the Governors' Conference, Haig said he had a call and that, first, it was subpoenaed; second, that as far as the tape was concerned that they thought this ought to be disclosed to Judge Sirica, and, third, that, and all of these things occurred there, and when we got back to the White House where there was a further discussion about it that evening; third, that it could not be reconstructed because that was another point that I made, even though it was a non-subpoenaed tape, I said, see if you can reconstruct it and see if we can find any notes as to what was on it. And all they were able to do -- they couldn't reconstruct it -- they found it was subpoenaed and they found Haldeman's notes, these rather benign notes, and as to what is on them as far as anything that the Special Prosecutor is interested in --

1 Q And in terms of the portions of the conversation
2 in which you requested a determination as to whether it
3 could be reconstructed or whether notes could be located,
4 was that part of the initial discussions on the day that you
5 first learned that it might be a subpoenaed tape?
6 A I don't know which date it occurred. It was
7 during the whole period. You know how these things are. I
8 can't say that on the initial day I said, gee, go back and
9 see if you can reconstruct it.
10 Q We are only asking if you do have the recollection?
11 We understand the problem.
12 A Yes, you understand, but all I can tell you is
13 over all of that time period all of these things were
14 discussed and I wouldn't affirm or deny what somebody else
15 said with regard to whether they talked to me on the 14th
16 and I said, well, maybe it was the 16th, I just don't
17 recall. I do recall all of them were discussed with me and
18 mostly at my initiative.
19 Q Did General Haig or Mr. Buzhardt or Mr. Powers
20 communicate to you anything about what was the cause of the
21 eighteen and a half minute gap during this period?
22 A Now, we could spend the rest of the day if we
23 went into that, but I can only say this, that these
24 amateurs, and let me say to you, ladies and gentlemen, if
25 you are not a lawyer you will be one day, so we will say,

1 ladies and gentlemen, as lawyers when you have a technical
2 problem, don't try to solve it yourself. These clowns --
3 pardon the expression -- they go in, they try to re-create
4 this and that and the other thing and instead of getting
5 an expert in right away to find out about the noise, of
6 course they did and they told me, well, we don't know,
7 we think maybe a lamp caused it or maybe it had to be done
8 by a lamp and a typewriter on of a certain type may have
9 caused it, and then at another time they said, well,
10 we are not sure, it must have been done in another way.
11 All that they knew was that they were able to
12 get at it, and they eventually did call experts in, and they
13 were also trying to do it, incidentally, working with a copy
14 at this time -- they didn't work with the originals, so
15 there is no question about their doing any erasure, as far
16 as I know -- at least they told me they were working with
17 copies.
18 In any event, all of this discussion and whether
19 it occurred or what day it occurred, I can't tell you, but
20 it was over a period of time as to how it might have
21 happened. All they said is that you had to have the record
22 button on and you had to have -- in this case Miss Woods
23 was using a foot pedal -- when I listened to the tape I
24 have not done that, but of course when you are not typing
25 you don't need a foot pedal, you can just listen the other

1 way.

2 I should point out, in terms of time, that this

3 conversation about what caused it and who caused it, and so

4 forth and so on, these conversations occurred after the

5 Governors' Conference -- I mean after we got it down to

6 Sirica's court -- because then it was an issue, a public

7 issue. Before that time I was, frankly, so tied up with

8 other things that all that I was doing was waiting for them

9 to give me a recommendation.

10 Now you understand what they were doing in this

11 period was, I am sure, trying to find out whether they could

12 reconstruct it and what caused it. But as far as my

13 conversation with them, the conversations that I just

14 referred to occurred after the Governors' Conference, when

15 they all, in their great wisdom, had determined that it was

16 a subpoenaed tape, that it could not be reconstructed, and

17 that they didn't know how it happened, but that it had to be

18 done, they thought, manually, which, incidentally, I have

19 learned from -- of course, every expert in the country now

20 is an expert on the tapes -- but I have learned it can be

21 done apparently technically, as well, and I think that there

22 is no reason this should not be in the record.

23 I saw recently where a Cleveland authority

24 on tapes points out that malfunctions of a machine often

25 erase. This I understand is not evidence for you --

1 Q Well, we appreciate, of course anything that
2 you might want to contribute relating to what might have
3 caused it.
4 A Yes. I don't know how it happened.
5 Q You have mentioned that it now became a more
6 public issue. At this point do you recall whether or not
7 you contacted or had anybody contact Mr. Haldeman to see
8 whether he had a more complete recollection as to what was
9 on the June 20th tape?
10 A I don't recall that, but Mr. Haldeman's notes
11 came into our possession, and I think what happened there
12 is that I asked either Higby or Buzhardt -- not Higby, --
13 Q General Haig?
14 A Haig or Buzhardt -- I don't know which one -- they
15 worked interchangeably, to see whether we could -- you see,
16 we had had earlier, as you know, we had earlier the problem
17 of what were called the - quote - two missing tapes - end
18 quote. They were not tapes missing at all. They were
19 simply unrecorded conversations. So under the circumstance
20 I wanted to do everything possible in cooperating with the
21 Special Prosecutor, if we couldn't have a recording, to give
22 them what we did have, so I authorized or asked somebody to
23 get a hold of Haldeman and get his notes. I don't recall when
24 or how.
25 Q Do you recall whether during this time or at any

1 point you requested though that Mr. Haldeman be contacted
2 to get his recollection of the meeting?
3 A I don't recall that.
4 Q Or did you have such a conversation with
5 Mr. Haldeman?
6 A No, I don't recall that. I note you were
7 referring to the Haldeman notes. That was his recollection.
8 I imagine it is all he could recall.
9 Q Now I think we could, given one of your earlier
10 responses to this, ask more of a summary question: During the
11 second round of hearings Miss Woods testified on several
12 occasions, Mr. Bull testified on several occasions, Mr.
13 Buzhardt testified and General Haig testified. Do you
14 recall whether you discussed with them the content of their
15 testimony?
16 A At what time?
17 Q At around the time they were giving it. I ask
18 it generally in light of your earlier response.
19 A No. Let me say, first, that they were all aware
20 of, with regard to the disclosure of testimony. In fact,
21 Mr. Rhyne, a very close friend of mine, in the second go-
22 around was representing Miss Woods and told her that she
23 couldn't even tell me what she was testifying about, but the
24 point is that as far as what their testimony had been, they
25 followed the rules that people are supposed to follow with

1 regard to testimony before a Grand Jury.

2 As far as each of them was concerned, I can't

3 recall any extended, or as a matter of fact any specific

4 conversations in which we discussed what the testimony would

5 be. I was only following it in terms of what the facts

6 might be and to me the most intriguing part of it was this

7 great panel of experts, what they were going to come up with.

8 I had every confidence that Miss Woods'

9 testimony would, and any member of my staff's, testimony

10 would be, I thought, as responsive as they could make it.

11 And if the import of your question is did I

12 coach them, did I tell them what to say, did they ask me

13 what to say, the answer is, no.

14 Q During the course of your testimony this

15 morning, you have told us about the report that Miss Woods

16 made to you regarding the brief buzz which she may have

17 caused on, I guess, October 1. Now apart from that, has

18 Miss Woods ever told you that she was responsible for or

19 caused the erasure of the entire eighteen and a half minutes

20 of the conversation?

21 A No, on the contrary, she has always denied that

22 the buzz that she heard was more than four and a half to five

23 minutes, and she cannot explain how eighteen minutes could

24 have occurred. She doesn't, incidentally, charge that

25 anybody else did it or was there, and she doesn't know, but

she says her best recollection is that it was a very brief buzz and that is what she had told me.

Q Now has Mr. Bull ever indicated to you that he caused or was responsible for the erasure of any portion of that tape?

A No, no, never.

Q Has anybody else ever indicated to you that they were responsible for or caused the erasure of that tape?

A I want to assure the Special Prosecutor and his staff that I, of course, had the most intensive investigation made to see if anybody else had had access who might have done it, including even the Secret Service, and they said, no. When I say, they said no, the reports were unanimous. They had no other occasions that anybody else who had access to the tapes could have done it.

Q You referred to the investigation. Do you recall who was charged with that responsibility?

A Well, just Haig generally, and he was so busy with other things. How many people he asked, I don't know.

Q So --

A Yes, I should emphasize that I didn't write a memorandum saying, ordering an investigation. It was simply a conversation. I said to him, I said, let's find out how this damn thing happened.

I am sorry, I wasn't supposed to use profanity. You have enough on the tapes.

Q Apart from what we have discussed today, and I would assume you may be aware from the public testimony, do you have any other information as to who might have been responsible for and who might have caused the erasure of that tape?

A No, I have none.

MR. DAVIS: I am going to now consult with the two representatives from the Grand Jury to see if they have any further questions that they would like to ask.

THE WITNESS: Sure. Do anything you like.

BY MR. DAVIS: (Counsel and jurors withdraw from conference room.)

Q Just to make sure we understand the terms of this request of General Haig, if I understand it correctly, and I want you to correct me if I am misstating it at all, you made a generalized request of General Haig to see if he could determine anything as to what or who was responsible, and he reported back to you, I assume orally, that he had no better explanation than anybody else. Is that a fair statement?

A I think a more accurate statement is that rather than my calling Haig in and saying, look, now you conduct an investigation into this thing, it is that in our conversations about it, and Buzhardt might have been present

1 at some, I said, let's do everything we can to find out how
2 this has been caused and if anybody else might have caused
3 it, and Haig's evaluation -- which he is a very honest
4 man -- I mean, in evaluating with all of the bark off --
5 plus there is no evidence whatever to indicate that anybody
6 else could have done it.
7 Now let me say this does not mean that this
8 Special Prosecutor's office and the Grand Jury should not
9 proceed on a more thorough way in questioning every other
10 individual who might have had access.
11 If you are interested in my view as to what
12 happened, it is very simple. It is that it was an accident.
13 My view as far as Miss Woods' role is that I believe her
14 totally, but I guess I would be expected to because she has
15 been with me so long and she is deeply religious, but she
16 doesn't wear it on her sleeve; she has it here in her
17 heart, and she would never lie to me, and under these
18 circumstances when she said that she didn't erase anything,
19 that she didn't hear anything, she doesn't know what is on
20 it, I believe her. I realize that is not evidence, but it is
21 at least my opinion, but the other point that I make is that
22 with regard to the others, anybody else, I don't know of anybody
23 else, General Haig doesn't know of anybody else, Buzhardt
24 doesn't know of anybody else, and also the important thing
25 is that the panel of experts could not really find a basic

1 agreement as to even how it occurred. They do, up to a
2 point, but there are so many, from having cursorily, giving
3 a cursory reading of the report, there are so many loop-
4 holes that they just aren't going to get caught on that.
5 I don't know how it happened.
6 Q Without of course going into the experts' report
7 or any of that, I just want to ask one question based on
8 your last response, and that is when you say that it is your
9 opinion that it was an accident, are you saying that the
10 entire eighteen and a half minutes took place or the entire
11 eighteen and a half minute gap was created by Miss Woods'
12 accident that she reported to you?
13 A No, I am not saying that at all. I am saying that
14 I think whatever occurred, and assuming that it was an
15 erasure, which I think could be assumed based on the fact
16 that the experts did find scraps of words, -- Miss Woods
17 doesn't like the word erasure because she said she didn't
18 hear anything, and of course I believe her.
19 My point is as far as anything she did, it was
20 an accident. As far as the balance of it, she could have
21 done it all and it would have been accidental, some mal-
22 function of the machine. She could have. She doesn't think
23 so. She says it was only four and a half to five minutes.
24 That is what she testified to, and that is what she told
25 me personally. As far as some third person, another person

1 getting to it and erasing it, I, first, I know of no such
2 person, I haven't heard of any person, and, second, I know
3 of no motive, particularly when you look at these notes.
4 I mean I wish we could find it.
5 MR. DAVIS: I think we all do.
6 THE WITNESS: I mean this is pretty good stuff.
7 MR. DAVIS: I think that is all of the questions on
8 this subject. Thank you very much.
9 (Whereupon, at 12:45 p.m., the deposition was re-
10 cessed, to reconvene at 1:45 p.m. the same day.)
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25