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Folder Title:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

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Withdrawal/Redaction Sheet

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
001. letter	DOB (Partial) (1 page)	01/18/1995	P6/b(6)
002. report	re: Financial disclosure report (14 pages)	01/11/1995	P6/b(6)
003. letter	re: Financial disclosure (Partial) (1 page)	12/05/1994	P6/b(6)
004. letter	Personal (Partial) (1 page)	10/12/1994	P6/b(6)
005. form	re: Tax forms (2 pages)	09/12/1994	P6/b(6)
006. form	re: Tax forms (7 pages)	09/12/1994	P6/b(6)
007. form	SSN (Partial); DOB (Partial); POB (Partial); Medical (Partial) (3 pages)	08/16/1994	P6/b(6)
008. form	re: Financial statements (7 pages)	08/02/1994	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jm1014

RESTRICTION CODES

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

- P1 National Security Classified Information [(a)(1) of the PRA]
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- P5 Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA]
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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)]

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FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE

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SANDRA L. LYNCH
(617) 832-1140

January 18, 1995

FEDERAL EXPRESS
FAX 202-514-5715
CONF. 202-514-4582

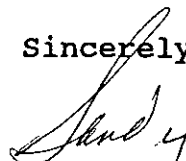
Renee Landers, Esq.
Assistant Attorney General
U.S. Department of Justice
Main Building, Room 4248
10th and Constitution Avenue NW
Washington, D.C. 20530

Dear Renee:

Enclosed please find my letter to Senator Orrin Hatch, as we discussed. I would appreciate your transmitting this letter to Senator Hatch.

Thank you.

Sincerely,



Sandra L. Lynch

/sav

FOLEY, HOAG & ELIOT

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January 18, 1995

FEDERAL EXPRESS

The Honorable Orrin G. Hatch
135 Russell Office Building
Chair, Senate Judiciary Committee
Washington, D.C. 02510

Dear Chairman Hatch:

This letter supplements information contained in my Senate Questionnaire in response to a request for information concerning policy positions I had taken or supported while I was an officer and Board member of the Civil Liberties Union of Massachusetts ("CLUM").¹

I was a member of the CLUM Executive Committee (later renamed the Board) in 1972-73, a member of the Board in 1974-75, the Advisory Committee in 1975-76, First Vice-President in 1976-78, and a member of the Board from 1979 to 1981. I was one of several outside General Counsel from May 1981 to May 1983.

As First Vice President, my role was to run meetings in the absence of the President and perform such other tasks as might be assigned by the President. The records do not reflect that I ever ran a meeting. The Board is the governing body of CLUM. In practice, as a member of the Board, my role was to attend meetings, listen to and sometimes participate in discussion of issues brought to the Board, and to vote on issues properly presented for vote. Board members played no role in the selection of CLUM cases. Advisory Committee members could attend and speak at Board meetings, but could not vote, and did not set policy. The Board attempted to meet once a month, but did not always do so.

Although nominally charged with supervision of the legal

¹ The information in this letter is based on my memory of events going back several decades, conversations with the CLUM staff, my review of records, including those made available since I prepared the original Committee Questionnaire in 1994, and my search of records at the Massachusetts Historical Society.

page 2
Chairman Hatch
January 18, 1995

program, in practice General Counsel played only an advisory role to the staff attorneys at CLUM through attendance at "Screening Committee" meetings. New case selection was normally decided by staff counsel. A potential new case was referred to the Screening Committee only if there were issues as to whether there were civil liberties principles involved in accord with policy set by the Board. My recollection is that there were four such General Counsel, all in private practice, all serving simultaneously.

I have organized the information as to policy positions chronologically. The great bulk of my involvement was 15 to 23 years ago and I do not always recall specific positions I advocated or supported back then. I have done my best to refresh my recollection by reviewing records. The records usually do not reflect specific members' positions. Where they do, I have set forth my position.

1972

I requested CLUM to join in an amicus brief on behalf of the Massachusetts Commissioner of Corrections who had been sued by the guards' union challenging the Commissioner's qualifications for office after he instituted reforms. The Executive Committee voted not to join the brief.

At a meeting I attended, a majority of the Executive Committee voted to support the United Farm Workers' boycott of non-UFW lettuce but to consult with the national office about this action. I do not recall this vote or my position on this matter, which was twenty-three years ago, nor do the records reflect it.

1973

At meetings I attended, the Executive Committee (later renamed the Board) voted a resolution supportive of legal services programs for the poor. I have no memory of this issue or my position, but I have generally supported legal services for the poor.

A majority of the Board voted to support the "Boston Plan" of the Commonwealth of Massachusetts with respect to hiring of qualified minority workers on construction projects funded with state funds in neighborhoods with high proportions of minorities. I do not recall the issue or my position on this issue from more than twenty years ago. A contractors' group had challenged the policy. The Board did not determine in what way its support of the Boston Plan would be expressed and the matter was referred to the chair and counsel. I understand that CLUM eventually filed

page 3
Chairman Hatch
January 18, 1995

an amicus brief. I had no involvement with the brief.

1974

In 1974, at meetings I attended the Board voted to authorize preparation of an amicus brief to the Massachusetts Supreme Judicial Court on a pre-Furman mandatory death penalty statute that required automatic imposition of the death penalty for murders committed in the course of rape or attempted rape. I have no memory of the mandatory death penalty issue. It is my understanding that the request for the amicus was based on the argument the statute was not constitutional under the law at the time in light of the Furman decision. The Massachusetts Supreme Judicial Court had invited amicus briefs and later held that the statute was unconstitutional.

The Board also voted to work to have the injunction lifted against public screenings of the film Titticut Follies (concerning conditions at a state institution for the mentally ill). My memory is that I did not participate in the Titticut Follies issues before the Board because I was an Assistant Attorney General at the time and the Attorney General was required to be given prior notice of all screenings under the terms of the injunction.²

1975

In 1975, at meetings I attended the majority of the Board voted to authorize CLUM to accept government funding (as to which I expressed strong uneasiness during the discussion and as to which I was in the minority on the vote).

The Board voted on a policy on campaign finance. I do not recall this matter or my position. The records reflect that the policy recognized there were competing civil liberties concerns in campaign finance laws and proposals. CLUM did not find inherently objectionable on civil liberties grounds laws which placed reasonable limits on contributions amounts and on contributions from corporations and entities (recognizing that specific examples of such laws could be objectionable). The Board did not find inherently objectionable limits on amounts candidates could receive or spend, or public disclosure of contributions made and how campaign money was spent. CLUM had no theoretical objection to public financing but had reservations

² As an Assistant Attorney General for Massachusetts I had successfully defended challenges to the state obscenity laws. I also did not participate in any obscenity laws matters before CLUM.

based on possible exclusion of minority parties.

1976

In 1976, at meetings I attended a majority of the Board voted to support the position that raw contents of police logs should be kept confidential in light of privacy interests and that the public's right to know was satisfied once an individual appeared in court. A minority of the board felt that such logs should be open to public scrutiny. I do not recall what my position was.

1977

In 1977 at meetings I attended, CLUM, at the request of then Massachusetts Attorney General Bellotti, supported state court reform legislation as recommended by a Commission chaired by Professor Archibald Cox. I supported this position. The Massachusetts legislature later enacted many of these recommendations. The Board voted to oppose the concept of the universal use of Social Security number as an identifier means. I do not recall my position on that issue.

At a meeting I attended, the Board initially voted against a request that it oppose creation of a special prison unit in Worcester for violent women already incarcerated. The request to oppose was on grounds that the transfer to the unit was not accompanied by any procedural due process protections as provided under law at the time. At a later meeting I did not attend, the Board voted to oppose the creation of the unit. I do not believe I had any participation in this vote to oppose.

The Board initially took no position on a motion to oppose a bill providing for state prison expansion. I moved to table a motion to oppose prison expansion, which was so voted. At a later meeting the motion to oppose was renewed. That opposition was based on the state's failure to implement a law passed earlier providing for a series of other penal measures and a failure to show need. I ultimately voted to oppose the bill based on the position that the state should first implement its statute (Ch. 777 of the Acts of 1972) giving the Commissioner of Corrections vast powers and flexibility as to custody arrangements for committed offenders and then determine the need for prison expansion. This was similar to the position taken by the Massachusetts Bar Association.

1978

No policy matters were determined at the one meeting I attended in 1978.

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001. letter	DOB (Partial) (1 page)	01/18/1995	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jm1014

RESTRICTION CODES

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page 5
Chairman Hatch
January 18, 1995

1979

At the meetings I attended in 1979 the Board voted to oppose the expenditure of public funds on a platform on which the Pope would say Mass during his visit to Boston. I voted to oppose such an expenditure of public funds for a religious service. The city decided not to expend public monies on the platform. In a federal lawsuit attempting to stop the Pope's appearance, CLUM later defended the Pope's ability to appear on the Boston Common, which I believe I supported.

1980

In 1980, at meetings I attended, the CLUM Board expressed to the Board of the ACLU its objection to ACLU associating itself with the Playboy Foundation and said that CLUM would not cooperate with the Hugh Hefner First Amendment Awards. I supported CLUM's position.

1981

No policy matters were determined at the four meetings I attended in 1981.

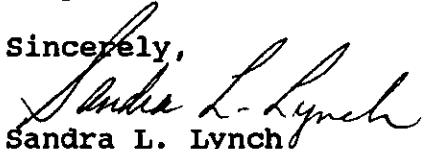
1982-1983

I attended no Board meetings in 1982 or 1983. As one of the four General Counsel, I recall attending only one Screening Committee meeting and do not recall what was discussed. I have found no records of any Screening Committee meetings from May 1981 until January 1983, but there may have been meetings. According to the records, there was a Screening Committee meeting which I attended on January 26, 1983.

[001] It is also my recollection that in 1982 and 1983 I did little with CLUM due to the press of practice and the birth in [REDACTED] (b)(6) of my son, Stephen. I was also named to the Board of Bar Overseers on September 1, 1982 by the Supreme Judicial Court.

Thank you for the opportunity to provide this information.

Sincerely,


Sandra L. Lynch

/sav

cc: The Honorable Joseph R. Biden, Jr.

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE

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SANDRA L. LYNCH
(617) 832-1140

January 12, 1995

FEDERAL EXPRESS

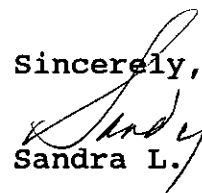
Preeta Bansal, Esq.
The White House Counsel's Office
Room 128 - Old Executive Office Bldg.
Washington D.C. 20500

Dear Preeta:

Enclosed are substitute copies of the Form AO-10 which were enclosed in the Senate Judiciary Committee Questionnaire. This new form is changed only to reflect that the date of the nomination and the date of the report was January 11, 1995. I would appreciate your passing it on to the Senate. Thank you.

I hope that you are well.

Sincerely,


Sandra L. Lynch

/sav
enc.

Withdrawal/Redaction Marker

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DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
002. report	re: Financial disclosure report (14 pages)	01/11/1995	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jm1014

RESTRICTION CODES

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

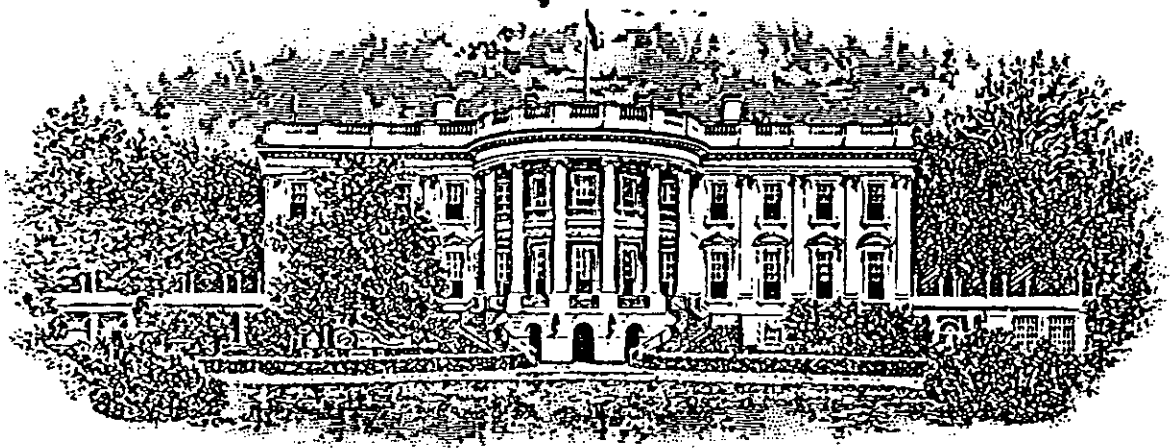
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The White House



COUNSEL'S OFFICE

FACSIMILE TRANSMISSION COVER SHEET

DATE:

January 6

TO:

~~Janet~~ Sandra Lynch

FACSIMILE NUMBER:

617 832-7000

TELEPHONE NUMBER:

FROM:

Preeta Bansal

TELEPHONE NUMBER:

202/456-7804

PAGES (WITH COVER):

3

COMMENTS:

PLEASE DELIVER AS SOON AS POSSIBLE

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THE WHITE HOUSE
WASHINGTON

January 6, 1995

VIA FACSIMILE

To: Sandra L. Lynch
From: Victoria L. Radd
Associate Counsel to the President
Re: Financial Disclosure Report and Senate Judiciary
Committee Questionnaire

As you know, your nomination was returned to the White House when the Senate adjourned in October. Although we have not yet made final decisions on the resubmission of any judicial nominations returned by the last Congress, we believe that it is appropriate for you to begin to prepare updated forms at this time.

As before, all judicial nominees must file a Financial Disclosure Report within five days of their nominations being submitted to the United States Senate by the President. You filed a Financial Disclosure Report at the time of your 1994 nomination, but will be required to file a new form or an amended form if your nomination is resubmitted.

The information on the form must cover financial data up to, or within thirty days of, your renomination. If there are only minor changes to be made on the form you submitted for 1994, you may amend that form. If, however, there are significant changes, I would recommend that you complete a new form. Please call Sheila Joy (202/514-1607) or Preeta Bansal (202/456-7804) if you have questions regarding the form.

All nominees will be required to submit an updated version of their Senate Judiciary Committee questionnaire (to include a new signature and certification by notary). You should review your questionnaire to determine what, if any, changes or updates would need to be made. If you have

any questions about your questionnaire, please call Preeta Bansal.

We will notify you when the new or amended Financial Disclosure Report and questionnaire should be submitted, but if at all possible you should plan to have both documents ready for filing by the end of the week of January 9, 1995. As before, we will ask you to file your Financial Disclosure Report directly with the Administrative Office of the United States Courts and to send your completed questionnaire to this office for filing with the Senate Judiciary Committee.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
003. letter	re: Financial disclosure (Partial) (1 page)	12/05/1994	P6/b(6)

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Counsel Office
Victoria Radd
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FOLEY, HOAG & ELIOT

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SANDRA L. LYNCH
(617) 832-1140

December 5, 1994

FEDERAL EXPRESS

Preeta Bansal, Esq.
The White House Counsel's Office
Room 128 - Old Executive Office Bldg.
Washington D.C. 20500

Dear Preeta:

I need to make some corrections to my Senate Judiciary Committee Questionnaire in light of information I have received since I submitted that questionnaire.

[003]

(b)(6)

(b)(6)

Therefore, I enclose a revised page 23 to my Judiciary Committee Questionnaire and a copy of the revised AO-10 form that I have filed.

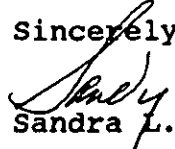
I had also been requested to pull together information concerning my activities with the Civil Liberties Union of Massachusetts, which required me to obtain records from CLUM, and to go to the Massachusetts Historic Society for 1970's records as to CLUM. Based upon those records, I need to correct some of the dates attributed to particular activities. As a result, I also enclose a revised page 4 of my form.

I also enclose an entire form with revised pages 4 and 23.

In preparation for resubmission of the forms next year, could I ask you to send me a blank Financial Statement form from the Committee Questionnaire. I'd also appreciate learning when you anticipate submitting the re-nomination papers. Thank you.

I hope that you are well.

Sincerely,


Sandra L. Lynch

/sav
enc.

LIB_2 /0155052.WP

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109

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IN WASHINGTON, D.C.

1615 L STREET, N.W.

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0600

SANDRA L. LYNCH

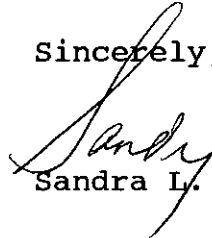
October 14, 1994

Preeta Bonsal, Esquire
Office of The White House Counsel
Room 128 - 00 Executive Ofc Ba
Washington, C.C. 20500

Dear Preeta,

I thought you should have a copy of the enclosed letter for
your file.

Sincerely,



Sandra L. Lynch

SLL/td
Enclosure

Withdrawal/Redaction Marker

Clinton Library

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- 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 COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF EMPLOYMENT AND TRAINING

WILLIAM F. WELD
GOVERNOR

GLORIA CORDES LARSON
SECRETARY OF ECONOMIC AFFAIRS

NILS L. NORDBERG
COMMISSIONER

Date: October 12, 1994
Telephone: (617) 626-5032
Status Determination Section

Sandra Lynch
69 Naples Rd.
Brookline, MA 02146

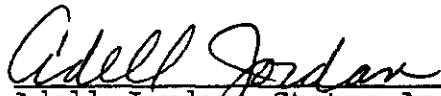
Dear Employer:

You have been determined not subject to the Massachusetts
Employment and Training Law through July 30, 1992.

[004] Employer number (b)(6) has been assigned for refund purposes
only.

Please complete the enclosed form(s) using the above number to
request a refund for this period only.

Sincerely,


Adell Jordan, Status Analyst
CONTRIBUTIONS DEPARTMENT

Encl.: FORM 0735 (1)

674 Massachusetts Avenue
Cambridge
Massachusetts 02139
Telephone (617) 868-1974
Fax (617) 868-4285



September 9, 1994

Stacey Reynolds, Esq.
Office of Counsel to the President
Room 530
Old Executive Office Building
Washington, D.C. 20500

Dear Ms. Reynolds,

I have been preparing the tax returns for Sandra Lynch for over 15 years. A graduate of Harvard Business School, I began managing Tax Man, Inc. as president in late 1969. Tax Man, Inc. is a chain of 25 tax preparation offices headquartered in Cambridge, Massachusetts. In 1975, I was the recipient of the Gold Medal from the Massachusetts Society of Certified Public Accountants, Inc. for the highest score in Massachusetts on the November, 1975 CPA examination and recipient of the Elijah Watts Sells Certificate of Honorable Mention for one of the highest scores in the nation.

In discussing her 1992 tax liability, Ms. Lynch asked me if she needed to withhold and pay employer taxes for an individual who cleaned her house. Based on the facts that: (1) the individual offered her services to the public and had many customers like Ms. Lynch, (2) controlled her own hours (and varied her time and hours as she saw fit), (3) determined the precise tasks to be done and her own work methodology, and (4) was not paid for any fixed amount of hours, it was (and still is) my judgment that the individual is self employed like painters, electricians and landscapers, etc.

Therefore I advised Ms. Lynch that withholding FICA and income taxes and filing employer tax forms for this individual were unnecessary.

In the fifteen (plus) years I have worked with Ms. Lynch she has always been very conscientious in paying her taxes and estimated taxes.

Sincerely,

Robert G. Murray
Robert G. Murray
President

RGM/jm

674 Massachusetts Avenue
Cambridge
Massachusetts 02139
Telephone (617) 868-1374
Fax (617) 868-4265



September 9, 1994

Stacey Reynolds, Esq.
Office of Counsel to the President
Room 530
Old Executive Office Building
Washington, D.C. 20500

Dear Ms. Reynolds,

I have been preparing the tax returns for Sandra Lynch for over 15 years. A graduate of Harvard Business School, I began managing Tax Man, Inc. as president in late 1969. Tax Man, Inc. is a chain of 25 tax preparation offices headquartered in Cambridge, Massachusetts. In 1975, I was the recipient of the Gold Medal from the Massachusetts Society of Certified Public Accountants, Inc. for the highest score in Massachusetts on the November, 1975 CPA examination and recipient of the Elijah Watts Sells Certificate of Honorable Mention for one of the highest scores in the nation.

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Sincerely,

Robert G. Murray
Robert G. Murray
President

RGM/jm

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE

BOSTON, MASSACHUSETTS 02109-2170

TELEPHONE: (617) 482-1300

CABLE ADDRESS: "FOLEYHOAG"

FACSIMILE (617) 482-7347

TELEX 940893

IN WASHINGTON, D.C.

1815 L STREET, N.W.

SUITE 830

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0500

SANDRA L. LYNCH

September 12, 1994

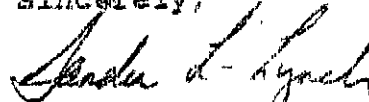
Internal Revenue Service
Andover, Mass. 05501-2222

Dear Sir or Madam:

Enclosed please find a return and check for payment of possible taxes owed. Over a period from January 21, 1992 to July 24, 1992, a woman came to my house on fourteen occasions to clean it. When I consulted with my tax preparer at the time, I was advised that in his judgment this individual was self-employed and was not my employee. As a result, I did not file returns then. On each occasion she was paid \$65. Her primary employment was elsewhere; she offered her cleaning services to the public and had several customers for whom she did work, she controlled her own hours and varied her day, time and hours as she saw fit when she cleaned my house, she was not supervised in the tasks that she did and determined the precise tasks to be done and her own work methodology, she was not paid for any fixed amount of hours and she brought supplies with her. Nonetheless, in an abundance of caution, I have enclosed the tax returns and payment (including a second check for any possible penalty/interest due) and leave the matter to you for resolution.

Thank you very much for your assistance with this.

Sincerely,



Sandra L. Lynch

/sav
enc.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
005. form	re: Tax forms (2 pages)	09/12/1994	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jm1014

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(9) Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA]

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE

BOSTON, MASSACHUSETTS 02108-2170

TELEPHONE: (617) 482-1320

CABLE ADDRESS: "FOLEYHOAG"

FACSIMILE (617) 482-7347

TELEX 940693

IN WASHINGTON, D.C.

1616 L STREET N.W.

SUITE 400

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0400

SANDRA L. LYNCH

September 12, 1994

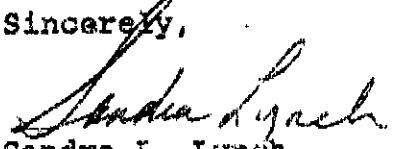
Social Security Administration
Data Operations Center
Albuquerque, New Mexico 87180

Dear Sir or Madam:

Enclosed please find a Form W-3 of possible taxes owed. Over a period from January 21, 1992 to July 24, 1992, a woman came to my house on fourteen occasions to clean it. When I consulted with my tax preparer at the time, I was advised that in his judgment this individual was self-employed and was not my employee. As a result, I did not file returns then. On each occasion she was paid \$65. Her primary employment was elsewhere; she offered her cleaning services to the public and had several customers for whom she did work, she controlled her own hours and varied her day, time and hours as she saw fit when she cleaned my house, she was not supervised in the tasks that she did and determined the precise tasks to be done and her own work methodology, she was not paid for any fixed amount of hours and she brought supplies with her. Nonetheless, in an abundance of caution, I have enclosed the tax returns and leave the matter to you for resolution.

Thank you very much for your assistance with this.

Sincerely,


Sandra L. Lynch/sav
enc.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
006. form	re: Tax forms (7 pages)	09/12/1994	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jml1014

RESTRICTION CODES

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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)]

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FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109

TELEPHONE: (617) 482-1390

CABLE ADDRESS "FOLEYHOAG"

TELECOPIER (617) 482-7347

TELEX 940693

IN WASHINGTON, D.C.

1615 L STREET, N.W.

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0600

TELECOPIER (202) 857-0140

SANDRA L. LYNCH

DETERMINED TO BE AN
ADMINISTRATIVE MARKING

INITIALS: JAM DATE: 9/20/13
2013-0670-F

~~CONFIDENTIAL~~

August 5, 1994
FEDERAL EXPRESS

Victoria Radd, Esquire
Associate Counsel to the President
The White House
Office of Legal Counsel
Second Floor, West Wing
Washington, D.C. 20500

RE: United States Court of Appeals for the First Circuit

Dear Ms. Radd:

At the suggestion of Jeff Blattner, I am forwarding to you the following information:

1. FBI clearances
 - a. An original and three copies of the Questionnaire for Sensitive Positions (SF-86) and Supplement (SF-86A) and attachments;
 - b. One original and three copies of The White House clearance memo;
 - c. Two copies of the tax check waiver;
 - d. Two signed and printed fingerprint charts.
2. Draft ABA Personal Data Questionnaire. I am forwarding the writing samples requested by the ABA under separate cover.
3. Draft Senate Judiciary Questionnaire, without writing samples.
4. Justice Department Information Requested of Prospective Judicial Nominee, including financial statement and

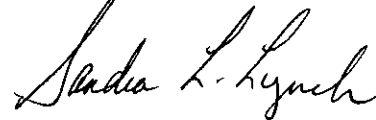
page 2
Victoria Radd, Esq.
August 5, 1994

federal tax returns for the years 1991, 1992 and 1993.

I will forward to you the Justice Department Medical
Condition form under separate cover when it is completed.

Thank you for assistance with this.

Sincerely,

A handwritten signature in cursive script that reads "Sandra L. Lynch". The signature is written in dark ink and is positioned above the printed name.

Sandra L. Lynch

/sav
enc.

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109

TELEPHONE: (617) 482-1390

CABLE ADDRESS "FOLEYHOAG"

TELECOPIER (617) 482-7347

TELEX 940693

IN WASHINGTON, D.C.

1615 L STREET, N.W.

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0600

TELECOPIER (202) 857-0140

SANDRA L. LYNCH

August 16, 1994

FEDERAL EXPRESS

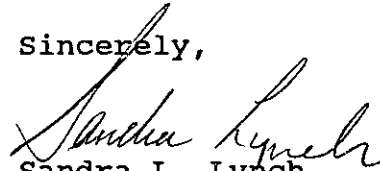
John Lane, Esquire
Office of The White House Legal Counsel
Room 125, Old Executive Office Building
Washington, D.C. 20500

Dear Mr. Lane:

Pursuant to our conversation, I am forwarding to you a copy of the ABA Personal Data Questionnaire which I have sent to Michael Greco and to William Willis.

Thank you so much for your guidance in this matter.

Sincerely,



Sandra L. Lynch

/sav
enc.

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
007. form	SSN (Partial); DOB (Partial); POB (Partial); Medical (Partial) (3 pages)	08/16/1994	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jm1014

RESTRICTION CODES

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

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

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PERSONAL DATA QUESTIONNAIRE

In answering these questions, please use letter size paper. Repeat each question and place your answer immediately beneath it. To expedite matters, send in your completed Questionnaire as soon as possible, since it is a prerequisite for the usual process of investigation.

- [007]
1. Full name and social security number.

Sandra Lea Lynch - S.S. (b)(6)

2. Office and home addresses, zip codes, telephone numbers and area codes. (Name of law firm, if associated.)

Office: Foley, Hoag & Eliot
One Post Office Square
Boston, MA 02109
617-482-1390 Ext. 5031

Home: 69 Naples Road
Brookline, MA 02146
617-277-5942

Bearcamp Pond
Sandwich, New Hampshire
603-284-6835

3. Date and place of birth.

(b)(6)

4. Are you a naturalized citizen? If so, give date and place of naturalization.

No.

5. Family status:

- a. Have you ever been married? If so, state the date of marriage and spouse's full name, including maiden name, if applicable.

I was married on October 13, 1973 to John Edwin Bowman, Jr.

- b. Have you been divorced? If so, give particulars, including the date, the name of the moving party, the number of the case, the court, and the grounds. Give the name and current address of any former spouse(s).

I am divorced. The Divorce Agreement and Judgment of Decree Nisi were entered on September 2, 1992 and the divorce became final on December 2, 1992. Each party moved for divorce in the Probate Court for Middlesex County, Massachusetts. The case numbers were 91D1281-D1&D2. John Edwin Bowman, Jr.'s current address is 10 Still Street, Brookline, Massachusetts 02146.

- c. Names of your children, with age, address and present occupation of each.

Stephen Lynch Bowman, age 11
69 Naples Road
Brookline, MA 02146
Student

6. Have you had any military service? If so, give dates, branch of service, rank or rate, serial number, present status, and type of discharge, if applicable.

No.

7. List each college and law school you attended, including dates of attendance, the degrees awarded and, if you left any institution without receiving a degree, the reason for leaving.

Boston University Law School, Boston, Massachusetts.
September, 1968 - June 1971, J.D. cum laude, June, 1971.

Wellesley College, Wellesley, Massachusetts.
September 1964 - June 1968, A.B. in Philosophy, June, 1968.

8. List all courts in which you have been admitted to practice, with dates of admission. Give the same information for administrative bodies which require special admission to practice.

Commonwealth of Massachusetts (1971).

United States Supreme Court (1974).

United States District Courts, District of
Massachusetts (1973) and District of Rhode Island
(1980).

United States Court of Appeals for the First Circuit
(1974).

I have been admitted pro hac vice in New Hampshire,
both state and federal court and, I believe, before the
Federal Energy Regulatory Commission.

9. Describe chronologically your law practice and
experience after your graduation from law school,
including:

- a. whether you served as clerk to a judge and, if so,
the name of the judge, the court, and the dates of
the period you were a clerk.
- b. whether you practiced alone and, if so, the
addresses and the dates.
- c. the dates, names and addresses of law firms or
offices, companies or governmental agencies with
which you have been connected, the nature of your
connection with each, and the names, addresses and
current telephone numbers for individuals who have
direct personal knowledge about your work at such
law firm, company or governmental agency.
- d. any other relevant particulars.

Summer Summer Clerk, Boston Legal Assistance Project
1971 Judge Patrick J. King, Superior Court,
 1112 New Courthouse, Boston, MA 02109.
 617-725-8148, FAX 617-725-8137

1971-1973 Law clerk, Chief Judge Raymond J. Pettine,
 U.S. District Court, District of Rhode
 Island, One Exchange Terrace, Providence,
 Rhode Island, 02903, 401-528-5195.

1973-1974 Assistant Attorney General, Government
 Bureau, Commonwealth of Massachusetts.
 Walter Howard Mayo, Esq., former Chief
 of Government Division, Casner & Edwards,
 One Federal St., Boston, MA 02110
 617-426-5900, FAX 617-426-8810

Instructor in Legal Writing, Boston
University Law School. Prof. Tamar Frankel,
Boston University School of Law,

765 Commonwealth Avenue, Boston, MA 02215.
617-353-4256, FAX 617-353-3077.

1974-1978 General Counsel, Massachusetts Department of Education. Rhoda Schneider, Esq., General Counsel, Mass. Dept. of Education, 350 Main St., Malden, MA 02148. 617-388-3300, FAX 617-338-3396. Edward G. Phillips, former Chairman, Mass. Board of Education, The New England, 501 Boylston Street, Boston, Mass. 02116, 617-578-2627, FAX 617-578-3776.

1978 to present Foley, Hoag & Eliot, One Post Office Square, Boston, Mass. 02109, Partner (1982), Past head of Litigation Department, Pro Bono Coordinator, Professional Responsibility Committee. Michael B. Keating, Esq., David B. Ellis, Esq., Foley, Hoag & Eliot, 617-482-1390, FAX 617-482-7347.

10. a. What has been the general character of your practice, dividing it into periods with dates, if its character has changed over the years.
- b. Describe your typical clients, and mention the areas, if any, in which you have specialized.

1978 - 1994

Large firm litigation practice with specialties in environmental and employment litigation and large, complex litigation. I have represented companies, both large (e.g. Polaroid) and small (e.g. Brokerage Concepts) as well as individuals. I have also represented entities such as the Massachusetts Turnpike Authority, the Massachusetts Division of Capital Planning and Operation, the Pension Plans of Public Service Company of New Hampshire and of Cabot Corporation, and the Commission on Judicial Conduct. I represent plaintiffs and defendants, but more typically, defendants. Sometimes I handle cases alone; more frequently, I have others working under my supervision.

1974 - 1978

Represented Massachusetts Board and Commissioner of Education in school desegregation, special education, transitional bilingual education and other education related cases. Ran law office of five attorneys.

1973 - 1974

Represented state agencies in my capacity as Assistant Attorney General. Constitutional law issues predominated.

1971 - 1973

Law clerk to United States District Court Judge Raymond J. Pettine.

11. With respect to the last 5 years:

- a. Did you appear in court regularly, occasionally or not at all? If the frequency of your appearances in court has varied during this period, describe each such variance, giving the dates thereof.

I appeared regularly in court several times a month except during the period when I was Boston Bar President, when the appearances were less frequent. Please see response to No. 12.

- b. What percentage of these appearances was in:

- 1) Federal courts.
- 2) State courts of record.
- 3) Other courts.

The majority of my cases have been in federal court, but the frequency of appearances varied between state and federal court from year to year.

- c. What percentage of your litigation was:

- 1) Civil.
- 2) Criminal.

Entirely civil.

- d. State the number of cases you tried to verdict or judgment (rather than settled) in courts of record, indicating whether you were sole counsel, chief counsel or associate counsel.

Excluding cases I won on summary judgment or motion to dismiss (of which there are many), and including evidentiary remedial proceedings and preliminary injunction hearings, the answer is in the range of 15 cases. One trial involved three consolidated cases and a class action lasting about two months, another involved trial

proceedings over nine months resulting in a jury verdict. There were numerous remedial hearings, orders, and appeals in the school cases. I was sole counsel in two cases, an associate in two. I was trial counsel with J. Harold Flannery playing lead counsel on the two month trial and Michael Keating as lead counsel in the nine month trial. I was lead counsel, assisted by others, on the remaining cases. I have also tried another case to an arbitrator.

e. What percentage of these trials was:

- 1) Jury.
- 2) Non-jury.

Only one was a jury trial. Anderson v. W.R. Grace, which took place from January to September 1986, and involved more than 29 plaintiffs. I was trial counsel with Michael Keating, who had the lead counsel role. I have prepared other jury trials which settled on the eve of trial, including the New Bedford Harbor contamination case.

f. If you believe the responses 11(a) through 11(e) do not reflect your experience, please describe any experience which you consider the equivalent of trial experience.

As noted above, I have won many cases on dispositive motion. I have settled many cases after significant discovery or as trial neared. An example is a case I handled for a young woman who was raped by her boss after a company function. In addition, I have defended against a major multi-year grand jury investigation which resulted in a decision not to prosecute. I also worked with state police when I was in government in a major criminal investigation which resulted in a number of convictions.

I have also twice been a master and an arbitrator, taking evidence and hearing witnesses. I frequently teach in trial advocacy courses.

12. Summarize your experience in court prior to the last 5 years, indicating as to that period:

- a. whether your appearances in court were more or less frequent.

- b. any significant changes in the percentages stated in your answers to question 11(b), (c) and (e).
- c. any significant changes in the number of cases per year you tried to verdict or judgment (rather than settled) in courts of record as sole counsel, chief counsel or associate counsel.

1978 - 1994

The frequency of my court appearances has varied over time. In 1986, I was involved in a massive federal court jury trial for the first nine months of the year involving 29 plaintiffs. In 1982 I spent almost two months in a trial in federal court. Until I became involved in the leadership of the Boston Bar in the last five years, I was in court frequently, on motion practice, for hearings, conferences, arguments. When not on trial, I was usually in court several times monthly. As I became more senior, with others working under me, and more involved in leadership in the Boston Bar Association, I went to court less frequently. The majority of my practice has been in federal court; the precise percentages vary with the mix of my caseload. Most of the caseload was civil, but there was one complex federal criminal grand jury matter which lasted more than a year. During that time, the criminal matter predominated.

1974 - 1978

I was often in court several times a week, with the vast majority of my work being in federal court. Most of the cases were civil, but I handled one major criminal investigation.

1973 - 1974

I was often in court several times a week. My practice was almost evenly divided between federal and state, with perhaps slightly more time in the Supreme Judicial Court of Massachusetts. All of my work was civil litigation.

13. Describe 10 of the most significant litigated matters, or matters that would be representative of your litigation experience, which you personally handled and give the citations, if the cases were reported. Give a capsule summary of the substance of each case, and a succinct statement of what you believe to be the

particular significance of the case. Identify the party or parties whom you represented; describe in detail the nature of your participation in the litigation and the final disposition of the case. Also state as to each case, (a) the dates of the trial period or periods, (b) the name of the court and the judge before whom the case was tried, (c) the individual name, address and telephone numbers of co-counsel and of counsel for each of the other parties.

1. Massachusetts Turnpike Authority v. F.L. Roberts, Exxon, Mobil and Canadian/Oxy (1991-1994) (Suffolk Superior Civil Action No. 90-2795) (Gordon Doerfer, J.)

I represented as lead counsel plaintiff Mass. Turnpike Authority against oil companies who had leased and contaminated service areas along Turnpike since 1956, seeking to recover assessment, clean up, response costs and damages for contamination in excess of \$10 million. I personally interviewed witnesses, analyzed documentary evidence and organized fact finding and witness interviews for facts going back over 26 years involving ten different sites and numerous environmental incidents, and led a team under my supervision. I personally worked with expert witnesses on establishing evidence of liability from environmental characterization of each site and projecting likely remediation scenarios and costs. I argued a summary judgment motion on a key indemnity point. Facing the prospect of more than 100 depositions, the parties agreed to go to ADR to reduce costs of litigation and expedite resolution. I personally mediated with Mobil, Canadian/Oxy, and Exxon. This resulted in agreements in 1993, approved by the court, under which the oil companies are cleaning up the ten sites. I argued the motion for court approval of the Exxon settlement, over the opposition of Roberts.

Counsel for Mobil	Robert M. Gault, Esq. Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. One Financial Center Boston, Mass. 02111 617-542-6000 FAX 617-542-2241
-------------------	--

Counsel for Canadian/Oxy	Harold Hestnes, Esq. Hale & Dorr 60 State Street Boston, MA 02109
-----------------------------	--

617-526-6000
FAX 617-526-5000

Counsel for Exxon Ralph T. Lepore, III, Esq.
 Michael A. Leon, Esq.
 Warner & Stackpole
 75 State Street
 Boston, MA 02109
 617-951-9000
 FAX 617-951-9151

Counsel for Thomas F. Holt, Esq.
F.L. Roberts Kirkpatrick & Lockhart
 One International Place
 Boston, MA 02110
 617-261-3100
 FAX 617-261-3175

2. Reebok International v. Design Continuum, Inc.,
 (Suffolk Superior No. 91-4858-B) (1991) (Botsford,
 J.)

Reebok developed and owns the highly successful THE PUMP™ technology. In July 1991, Reebok learned that Spalding introduced an inflatable baseball glove at a trade show. Because the glove appeared to have used Reebok's technology, Reebok sued Spalding in Illinois and Design Continuum ("DC") in Massachusetts, seeking preliminary injunctive relief. I represented Reebok as lead counsel in Massachusetts, alleging DC, which had provided design services to Reebok in developing THE PUMP™ under a strict confidentiality and proprietary information agreement, had violated the agreement, unlawfully used and misappropriated Reebok's trade secrets and confidential information, and engaged in unfair and deceptive trade practices. In a very swiftly moving case, I interviewed and prepared witnesses, did deposition work, prepared affidavits and opposition papers, and argued in a preliminary injunction hearing within several weeks after the complaint was filed. While the preliminary injunction motion was under advisement, the parties stipulated to certain relief and later resolved the case by agreement.

Counsel for
Design Continuum Robert Weinstein, Esq.
 Kassler & Feuer
 101 Arch Street
 Boston, MA 02110
 617-439-3800
 FAX 617-439-0060

Counsel for
Reebok in related
action

Sheri J. Engelken
Kirkland & Ellis
200 East Randolph Drive
Chicago, Illinois 60601
312-861-2432
FAX 312-861-2200

3. Deborah Wiener v. Polaroid Corp., et al, 790 F.
Supp. 363 (D. Mass. 1992) (Tauro, J.).

Assisted by an associate, I represented Polaroid and Polaroid supervisors in a claim by a female consultant that sexual harassment and sex discrimination resulted in her not being hired for a permanent position. The facts were very difficult. I interviewed, prepared and defended depositions of Polaroid's President, the supervisors and co-workers, and took plaintiff's deposition. I argued and won the Title VII claims on summary judgment. After my negotiation concerning the probability of success of the remaining claims, plaintiff voluntarily dismissed the case.

Counsel for
plaintiff

Dean Richlin, Esq.
Lucash, Gesmer & Updegrove
One McKinley Square
Fourth Floor
Boston, Massachusetts 02109
617-723-2770
FAX 617-723-3357

4. Korb v. Raytheon, 410 Mass. 581 (1991) (Superior
Court Judge Hallisey (1989 - 1991)

I successfully represented Raytheon as lead counsel in the trial court and on appeal in an action by a former company Vice President who had been terminated after he made statements at press conference critical of employer's biggest customers at Department of Defense and contrary to employer's interest. Korb, represented by Civil Liberties Union, claimed the termination violated his free speech rights under Mass. Civil Rights Act ("MCRA"). I raised the novel issue of First Amendment limits on use of state power (through MCRA) to force defendant to associate with speech with which it disagreed. I interviewed witnesses, prepared affidavits and successfully argued the summary judgment motion in the trial court. I argued on his appeal before the SJC. The SJC affirmed dismissal of his case.

I had originally removed the case to federal court because Korb's complaint alleged his First Amendment rights had been violated. Reaching a novel question, the district court held that an action brought under the MCRA in the private free speech context involving competing claims for First Amendment protection did not raise a federal question. Korb v. Raytheon, 707 F. Supp. 63 (D. Mass. 1989) (Woodlock, J.). I was assisted on all briefs by others, but I had primary responsibility.

Counsel for Korb	Jonathan Shapiro, Esq. Stern, Shapiro, Rosenfeld & Weissberg 80 Boylston Street, Suite 910 Boston, MA 02116 617-542-0663 FAX 617-451-0139
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Counsel for amicus Attorney General of Massachusetts	James M. Shannon, Esq. former Attorney General National Fire Protection Assoc. Batterymarch Park Quincy, MA 02169 617-984-7255 FAX 617-770-0200
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5. Gene Trak v. Roche Diagnostic Systems, Inc.
(Middlesex Sup. Ct. (C.A. No. 89-3266) (White, J.)
(Mass. Appeals Ct. No. 89-J496) (Dreben, J.)

As lead counsel, successfully defeated at trial court and on appeal attempt to enforce non-compete agreement against my client Roche, who hired scientist to help develop DNA/RNA diagnostic test kits based on Polymerase Chain Reaction (PCR technology). This technology would enable hospitals to quickly diagnose diseases such as AIDS and possibly save lives by shortening the time to diagnosis. Case presented issues of freedom of scientist to leave work on one patented technology he believed would fail in order to work on the only technology he believed would succeed (PCR). Legal issues involved interplay between the public disclosure policies of patent law and confidentiality policies of trade secret/non-compete law. Case involved explaining in simple terms highly technical scientific concepts. This case moved very quickly and involved intense fact preparation and several motions which I argued before the preliminary injunction hearing. I interviewed witnesses, came up to speed on the technology, obtained affidavits, inter alia, from Mass. Dept. of Public Health and a Nobel

Laureate on the severely adverse public policy impact of enforcing a non-compete agreement in this arena, and successfully argued against the preliminary injunction. On appeal, I successfully argued against a petition for interlocutory relief. I was assisted by associates on these matters.

Counsel for Gene Trak

Douglas Seaver, Esq.
Warner & Stackpole
75 State Street
Boston, MA 02109
617-951-9000
FAX 617-951-9151

Counsel for co-defendant Dr. Lawrie

David Angueira, Esq.
Bowditch & Dewey
161 Worcester Rd.
Framingham, MA 01701
508-879-5700
FAX 508-872-1492

6. Anderson v. Cryovac, Inc. (U.S. Dist. Ct. D. Mass.) (Docket No. C.A. 82-1672S) (Skinner, J.) (1983 - 1986)

Trial counsel along with Michael Keating, who was lead counsel, to W.R. Grace in lengthy jury trial in Woburn Toxic Tort Case. Families and individuals, twenty-nine plaintiffs, sued, claiming leukemia in their children had been caused by chemicals in drinking water, and that drinking water wells had been contaminated by movement in groundwater of chemicals from defendants. The Court divided this massive case into four separate trial phases. The first phase of case involved trial proceedings from January through September 1986, before a federal court jury on complex issues of hydrogeology and causation of contamination in wells. I participated in the limited juror voir dire and selection, handled numerous witnesses, including high company officials, did cross of plaintiffs' witnesses, and argued a number of evidentiary and other motions, including a change of venue motion. The jury verdict against Grace was vacated because the jury interrogatories were inconsistent. The case then settled.

In the face of enormous publicity threatening the ability to find an impartial jury, the trial court had issued protective orders prohibiting disclosure of information obtained through discovery except, as

needed, to public health and environmental officials. The Boston Globe challenged the orders, asserting there was a public right of access to such materials. I worked on the papers, but Professor Monaghan argued the matter. The trial court's orders were upheld on appeal. Anderson v. Cryovac, 805 F.2d 1 (1st Cir. 1986).

Counsel for plaintiffs

Jan Schlichtmann, Esq.
Marketplace Center
200 State Street
Boston, MA 02109
617-439-9567
FAX 617-439-4434

Counsel for co-defendant
Beatrice Food

Jerome Facher, Esq.
Neil Jacobs, Esq.
Hale & Dorr
60 State Street
Boston, MA 02109
617-526-6000
FAX 617-526-5000

Co-counsel for Grace on Globe's appeal

Prof. Henry Monaghan
Columbia University Law School
435 West 116th Street
New York, New York 10027
212-854-2644

7. Robinson v. Polaroid Corp., 567 F. Supp. 192 (D. Mass. 1983) (Skinner, J.), aff'd, 732 F.2d 1010 (1984)

Trial, almost two months long, in three related class action employment cases against my client Polaroid. I was second chair at trial to lead counsel, J. Harold Flannery, now a Superior Court Judge. I prepared and presented a number of Polaroid witnesses, including the company General Counsel, cross-examined several plaintiffs, and argued many evidentiary and other motions. Plaintiffs asserted that race discrimination motivated the layoffs of black exempt and non-exempt employees. Defense was that: (1) hourly layoffs were seniority based and, (2) as to salaried employees, Polaroid was an exemplary affirmative action employer who took risks in hiring, risks that could not continue in terms of poor performance in time of layoff and that

(3) statistical evidence showed no disproportionate impact. Defendants' verdict was affirmed on appeal. Legal issues on appeal involved interplay between disparate impact and discriminatory treatment analyses.

Counsel for Plaintiff

Jonathan Shapiro, Esq.
Stern, Shapiro, Rosenfeld
& Weissberg
80 Boylston Street
Suite 910
Boston, MA 02116
617-542-0663
FAX 617-451-0139

8. Spencer Companies, Inc. v. Agency Rent A Car, 542 F. Supp. 237 (D. Mass. 1982) (Skinner, J.) and Agency Rent A Car v. Connolly, 542 F. Supp. 231 (D. Mass. 1982) (Skinner, J.), vacated and remanded, 686 F.2d 1029 (1st Cir. 1982)

In related litigations, our client Spencer, a local shoe company successfully fought off a greenmail and then take-over attempt by a corporate raider. We convinced the First Circuit that a state statute and regulatory order thereunder forbidding the raider from purchasing more stock were not preempted by the Williams Act, to require abstention, and to vacate an injunction issued by the district court against enforcement of the state anti-take over statute. The district court had held the statute unconstitutional as an impermissible burden on interstate commerce and declined to abstain. We also convinced the District Court that Agency had violated the provisions of the Williams Act and so it preliminarily enjoined Agency's tender offer. I was an associate for most of the case, and did much of the fact preparation, some of the deposition work, and much of the brief writing. Christian Hoffman and David Walker of this firm were lead counsel.

Counsel for Agency: Mark Michelson, Esq.
Choate, Hall & Stewart
53 State Street
Exchange Place
Boston, Mass. 02109
617-227-5020

Robert Rothberg, Esq.
now General Counsel,
Cabot Corporation
75 State Street

Boston, MA 02109
617-345-0100

9. Baird v. Bellotti, 443 U.S. 622 (1979)
Planned Parenthood League of Massachusetts v. Bellotti, 641 F.2d 1006 (1st Cir. 1980), revs'g in part and aff'g in part 499 F. Supp 215 (D. Mass. 1980) (J. Mazzone)

My firm accepted pro bono cases on behalf of Planned Parenthood League of Massachusetts challenging a Massachusetts statute as unduly burdening access to abortions. The U.S. Supreme Court invalidated the statute. The legislature amended the statute and the First Circuit held portions of the new statute invalid as undue burdens. John Henn was lead counsel. I was an associate on the Supreme Court brief and second chaired the PPLM case, including preparation of witnesses and affidavits and brief writing.

Counsel for Defendant

Garrick F. Cole, Esq.
Smith, Duggan & Johnson
One Center Plaza
Boston, MA 02108
617-248-1900
FAX 617-248-9320

Counsel for Plaintiff:

Joseph J. Balliro, Esq.
Balliro, Mondano & Balliro, P.C.
3 Arlington Street
Boston, MA 02116
617-227-5822
FAX 617-437-1187

10. Boston School Desegregation Case: Morgan v. Kerrigan, 388 F. Supp. 581 (D. Mass. 1975), aff'd, Morgan v. Kerrigan, 401 F. Supp. 216 (D. Mass. 1974), denial of stay, 523 F.2d 917, aff'd, 530 F.2d 401 (1st Cir.), cert. denied, 426 U.S. 935 (1976) (remedial plan); Morgan v. Kerrigan, 409 F. Supp. 141 (D. Mass. 1975) (D. Mass. 1974), aff'd, sub nom. Morgan v. McDonough 540 F.2d 527 (1st Cir. 1976), cert. denied, 429 U.S. 1042 (receivership of South Boston High School). (Garrity, J.)

From 1974 to 1978, I was counsel to the Massachusetts Board of Education. My client was a defendant in the Boston school desegregation case along with the Boston School Committee. The Board of Education was held not

to have violated plaintiffs' rights. I briefed and argued several appeals to the First Circuit and prepared several briefs to the U.S. Supreme Court in opposition to other's appeals. I appeared in the trial court, often several times weekly, on a large variety of issues, for a several year period. I was lead counsel for the state Board. My co-counsel for a portion of the time was then Assistant Attorney General L. Scott Harshbarger.

Counsel for School Committee

Douglas Woodlock
(now U.S. District Court
Judge)
U.S. District Court,
John W. McCormack POCH
Boston, MA 02109
617-223-9293
FAX 617-223-9096

Marshall Simonds, Esq.
Goodwin, Procter & Hoar
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Boston, MA 02109
617-570-1000
FAX 617-693-1195

James J. Sullivan, Esq.
DiMento & Sullivan
100 State Street
Boston, MA 02109
617-523-5253
FAX 617-523-4793

Counsel for state L. Scott Harshbarger
now Attorney General of
Massachusetts
One Ashburton Place
Boston, MA
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FAX 617-727-3251

Counsel for plaintiffs

J. Harold Flannery, Jr.
(now Superior Court
Judge)
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617-725-8130
FAX 617-725-8137

Eric VanLoon, Esq.

Endispute, Inc.
73 Tremont Street
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617-228-0200
FAX 617-228-0222

Counsel for Intervenor
Home and School Association
Thayer Fremont-Smith
(now Superior Court
Judge)
Superior Court
New Court House
Boston, MA 02108
617-725-8148
FAX 617-725-8137

For Intervenor Boston Teachers' Union
John F. McMahon, Esq.
Angoff, Goldman, Manning, Pyle,
Wanger, & Hiatt, P.C.
24 School Street
Boston, MA 02108
617-723-5500
FAX 617-742-1015

For Intervenor School Administrators
Richard Coleman, Esq.
Segal, Roitman & Coleman
11 Beacon Street
Boston, MA 02109
617-742-0208
FAX 617-742-2187

Counsel for Intervenor El Committee
Carolyn Playter, Esq.
Kehoe, Doyle, Playter & Novick
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Boston, MA 02110
617-338-0070
FAX 617-338-2160

For Intervenor City of Boston and Mayor
Marilyn Sticklor, Esq.
Goulston & Storrs, P.C.
400 Atlantic Avenue
Boston, MA 02110
617-482-1776
FAX 617-574-4112

14. a. Have you ever held judicial office? If so, give dates and details, including the courts involved,

whether elected or appointed, periods of service, and a description of the jurisdiction of each of such courts with any limitations upon the jurisdiction of each court.

No.

- b. have you ever held public office other than judicial office? If so, give details, including the office involved, whether elected or appointed, and the length of your service, giving dates.

1971-1973 Law Clerk to Chief Justice Raymond J. Pettine, U.S. District Court, District of Rhode Island

1973-1974 Assistant Attorney General, Commonwealth of Massachusetts

1974-1978 General Counsel, Massachusetts Department of Education

Please also see Exhibit A.

15. Have you ever been an unsuccessful candidate for elective, judicial or other public office? If so, give details, including dates.

No.

16. Have you ever been engaged in any occupation, business or profession other than the practice of law or holding judicial or other public office? If so, give details, including dates.

No.

17. Are you now an officer or director or otherwise engaged in the management of any business enterprise?

No.

- a. If so, gives details, including the name of the enterprise, the nature of the business, the title or other description of your position, the nature of your duties and the term of your service.

- b. Is it your intention to resign such positions and withdraw from any participation in the management of any such enterprises if you are nominated and confirmed? If not, give reasons.

18. Have you ever been arrested, charged or held by federal, state or other law enforcement authorities for violation of any federal law or regulation, state law or regulation, or county or municipal law, regulation or ordinance? If so, give details. Do not include traffic violations for which a fine of \$100.00 or less was imposed.

No.

19. Have you, to your knowledge, ever been under federal, state or local investigation for possible violation of a criminal statute? If so, give particulars.

No.

20. Has a tax lien or other collection procedure ever been instituted against you by federal, state or local authorities? If so, give particulars.

No.

21. a. Have you ever been sued by a client? If so, give particulars.

I have never been sued by a client. My law firm has been sued for actions done by others and I may have been named as a defendant in some of those cases along with the other partners of the firm.

- b. Describe any claim or lawsuit which alleged an act or omission by you as a lawyer.

None.

- c. Have you ever been sanctioned pursuant to Rule 11 or pursuant to any other federal, state or local rule?

No. However, in Spencer v. Agency, the trial judge found Spencer had not complied with the terms of a protective order in asking questions at a deposition, held that was civil contempt and ordered the payment of Agency's counsel fees on the motion, saying that was the only harm Agency had suffered. I was an associate on the case at the time of the actions. All Spencer lawyers on the case, including me, wrote a letter of apology to the court, saying there had been a good faith belief there was compliance with the court's order and no intention not to comply.

22. Have you ever been a party or otherwise involved in any other legal proceedings? If so, give the particulars. Do not list proceedings in which you were merely a guardian ad litem or stakeholder. Include all legal proceedings in which you were a party in interest, testified as a witness, were named as co-conspirator or a co-respondent, and any grand jury investigation in which you figured as a subject, or in which you appeared as a witness.

I was a party in my divorce. Other than that, my law firm has from time to time brought suits to recover fees and I may have been named as a party in that capacity. I once testified in a fee collection case for my law firm that services had been rendered. That was Hoffman v. Van Gorder, U.S. District Court, D. Mass. Civ. Action 81-288K.

23. Have you ever been disciplined or cited for a breach of ethics or unprofessional conduct by, or, to your knowledge, been the subject of a complaint to, any court, administrative agency, bar association, disciplinary committee, or other professional group? If so, give the particulars.

No.

- 24.

(b)(6)

(b)(6)

25. Furnish as least 5 examples of legal articles, books, briefs or other legal writings which reflect your personal work. If briefs are submitted, indicate the degree to which they represent your personal work. If there are reported opinions relevant to a submitted brief, give the citation to or a copy of any relevant appellate opinion.

See publications attachment.

26. List all bar associations and professional societies of which you are a member and give the titles and dates of any offices which you have held in such groups. List all chairmanships of any committees in bar associations and professional societies, and memberships on any committees which you believe to be of particular significance (e.g., judicial selection committee, committee of censors, grievance committee).

1994 Advisory Committee on Rules of the U.S. Court of Appeals for the First Circuit (1993 through present).

Massachusetts Supreme Judicial Court
Committee on Model Rules of Professional
Conduct.

Massachusetts Supreme Judicial Court
Historical Society, Board.

ABA Commission on Partnership Programs (1993
- 1995).

1993 Member, Commission on Federal Appointments
(U.S. District Court, U.S. Attorney and U.S.
Marshal).

1992-1993 President, Boston Bar Association (voluntary
bar of 8,000 members, oldest Bar Association
in country).

National Conference of Bar Presidents, Member
and Speaker.

Bar Leadership Institute, ABA, speaker.

Various ABA Conferences on Justice System,
participant (1991 - 1994).

1991-1992 President-Elect, Boston Bar Association.

1987-1991 Secretary, Treasurer and Vice President of
BBA successively.

1986 Chair, BBA Committee on Role of Gender in
Practice of Law. Co-initiator of BBA Report
on Role of Gender in Practice of Law.

1986-1988 Member, Joint Bar Committee (advises Governor
on judicial appointments).

1986-1987 Council, Boston Bar Association.

1982-1986 Vice Chair, Board of Bar Overseers of
Commonwealth of Massachusetts 1985-1986,
Member 1982-1986. Bar disciplinary Board
(appointed by S.J.C.).

1982 Member, Screening Committee for U.S.
Magistrate, U.S. District Court (D. Mass).

1975-1977 Council, Boston Bar Association.

I am and have been for some time a member of the
American Bar Association, Boston Bar Association,
Massachusetts Bar Association, Women's Bar Association,
National Association of Women Lawyers.

27. List all organizations and clubs other than bar associations or professional associations or professional societies of which you are or have been a member, including civic, charitable, educational, social and fraternal organizations, and give dates of membership, offices held and honors bestowed.

I belong to the following organizations, as well as to those listed on Exhibit A:

Museum of Fine Arts, Boston
Museum of Science, Boston
Bearcamp Pond Association, Sandwich, New Hampshire
Sandwich Historic Society, Sandwich, New Hampshire
Massachusetts Audubon Society
WGBH, Boston
The Boston Club

28. List any honors, prizes, awards or other forms of recognition which you have received (including any indication of academic distinctions in college or law school) other than those mentioned in answers to the foregoing questions.

Awards

1993 Silver Shingle Distinguished Alumni Award,
Boston University Law School.

1980 Planned Parenthood League of Massachusetts
Distinguished Service Award.

Fellowships and Scholarships and Academic Awards

1974 National Endowment for the Humanities
Fellowship to study Constitutional Law at
University of Virginia for one month.

1968-1971 Scholarship to Boston University Law School,
Boston University Law Review, Articles
Editor. Book awards: Administrative and
Corporate Law (for highest grades in law
school class).

1964-1968 Seven College Scholarship to Wellesley
College

29. Describe any pro bono or community service activities in which you have engaged.

In 1992 - 1993, I was President of the Boston Bar Association and spent most of my time on the

presidency. As President, I involved the Bar in the education reform legislation efforts, initiated a summer jobs program for Boston Public School students, ran programs for unemployed lawyers, and engaged in a number of activities in support of the court system. In many ways the primary achievement of my year as BBA president was the enactment of major court reform legislation in Massachusetts. That legislation called for greater accountability of the court system and gave it needed management tools. Significantly, it also created a statewide juvenile court and consolidated the various jurisdictions over children and youth in that court.

Since being President of the Boston Bar Association, I have spent some time in community service activities designed to work on issues of job creation. That led me to work on a committee of the Massachusetts Taxpayers Foundation and on the Leading Industries Committee of the Boston Chamber of Commerce, of which I am now co-chair.

Throughout my career I have engaged in pro bono litigation in various matters. An example of such litigation is Bezio v. Patenaude, 381 Mass. 563 (1980) on which I worked while I was an associate. We argued that the trial judge was in error in removing a child from a mother simply on the basis of her sexual preference. I was appointed Special Counsel to the Commission on Judicial Conduct by our Supreme Judicial Court to prosecute a case against a state court judge, who ultimately resigned from the bench. I have represented indigent clients.

I have also been involved in improving the administration of justice, through my activities over a four year period on the Board of Bar Overseers for the Commonwealth of Massachusetts, including being Vice-Chair. I also served on the Joint Bar Committee which made recommendations to the Governor of Massachusetts concerning candidates for judicial appointment. I was also instrumental in instigating a report and survey conducted by the Boston Bar Association on the Role of Gender in the Practice of Law.

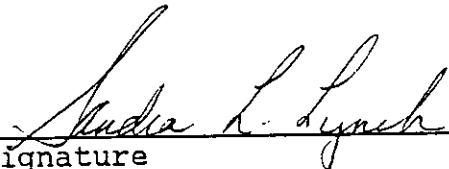
I was appointed by the Supreme Judicial Court to be Special Counsel to the Judicial Conduct Commission in the matter of Superior Court Judge Joseph S. Mitchell. I filed a petition seeking his removal from the bench. Judge Mitchell chose to retire.

I have also been involved in advising pro bono clients of the firm, including a day care center.

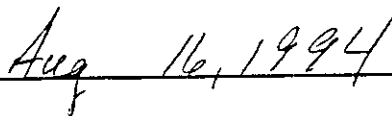
Please see Exhibit A for more information.

30. State any other information which may reflect positively or adversely on you, or which you believe should be disclosed in connection with consideration of you for nomination for the Federal Judiciary.

None.



Signature



Date

PUBLICATIONS

Damages in Massachusetts Litigation, "Damages in Sale of Goods, Insurance and Employment", MCLE (1993).

"Beyond Plato", Boston Bar Journal 2 (July/August 1993).

"The 724 Children", Boston Bar Journal 2 (May/June 1993).

"Anatomy of a Success: BBA and Court Reform", Boston Bar Journal 2 (March/April 1993).

"Mirror, Mirror On The Wall", Boston Bar Journal 2 (Jan./Feb. 1993).

"High Noon In The Courthouse", Boston Bar Journal 2 (Nov./Dec. 1992).

"Of Mice and Men ... And Women and Children," Boston Bar Journal 2 (Sept./Oct., 1992).

"Public Institution Litigation in the First Circuit," 74 Mass. Law Review 259 (Dec. 1989).

Various Mass. Continuing Legal Education Course Materials, including "Federal Court Motion Practice" (1989), "Avoiding and Litigating Wrongful Termination Cases" (1988), "Third Party Liability for Workplace Injuries" (1987), "Federal Court Practice" (1984), and MBA "Ready for Trial: Theme of Case and Preparation of Witnesses" (1990).

"The Boston School Desegregation Case", 62 Mass. L. Quarterly 137 (Fall 1977).

"Education Law", 1975 Boston College Annual Survey of Massachusetts Law 396.

"New England Regional Government", in Power, Pollution, and Public Policy, by Project NECAP (New England Coastal Area Planning), M.I.T. Press (1971).

Comment, "Little Ado About Much: Jurisdiction of the Supreme Court to Issue Mandamus," 51 B.U.L. Rev. 106 (1971).

Note, "Can the Section 1331 Amount Requirement Constitutionally Bar a Plaintiff Alleging Violation of His First Amendment Rights from Using the Federal Court to Get an Injunction Against a Federal Officer." 50 B.U. L. Rev. 178 (1970) (Special Issue).

EXHIBIT A

PROFESSIONAL ACTIVITIES

1994

Massachusetts Supreme Judicial Court Committee on Model Rules of Professional Conduct.

American Arbitration Association Panel on Large and Complex Cases.

1993-1994

Advisory Committee on Rules of the U.S. Court of Appeals for the First Circuit.

Board, New England Legal Foundation.

ABA Commission on Partnership Programs.

Wellesley College Business Leadership Conference.

Boston Chamber of Commerce, Leading Industries Committee.

1993

Silver Shingle Distinguished Alumni Award, Boston University Law School.

Member, Commission on Federal Appointments (U.S. District Court, U.S. Attorney and U.S. Marshal) established by Senators Kennedy and Kerry.

Massachusetts Taxpayers Foundation, Policy Committee.

1992-1993

President, Boston Bar Association. President of 8,000 member voluntary bar. Accomplished enactment of major court reform legislation resulting in greater accountability and efficiency, focussed bar on children (by sponsoring legislation creating statewide juvenile court, initiating bar involvement in education reform legislation, and summer jobs program for Boston students in law offices), initiated legislation for pay raise for state judiciary, created programs for unemployed lawyers, requested First Circuit initiate gender and racial bias studies. As President of the BBA I also sat on other boards such as the G. Robert White Trust and the Boston Coalition Against Drugs and Violence.

1991-1992

Special counsel to the Commission on Judicial Conduct to prosecute In the Matter of Justice Joseph S. Mitchell (appointed by Supreme Judicial Court).

President-Elect, Boston Bar Association, author of BBA Study: Courts in Crisis, A Blueprint for Reform.

1987-1991

Secretary, Treasurer and Vice President of Boston Bar Association (successively).

1986-1989

Chair, BBA Committee on Role of Gender in Practice of Law; co-initiator of BBA Report of same title, which was first gender bias study of a major bar.

1986-1988

Member, Joint Bar Committee (advises Governor on Judicial Appointments).

1986-1987

Council, Boston Bar Association.

1982-1986

Vice Chair, Board of Bar Overseers of Commonwealth of Massachusetts 1985-1986, Member 1982-1986. Bar disciplinary Board (appointed by S.J.C.).

1982-1984

Member, Massachusetts Advisory Committee, U.S. Civil Rights Commission.

1982-1983

Civil Liberties Union of Massachusetts, Board and General Counsel.

1982

Member, Screening Committee for U.S. Magistrate, U.S. District Court (D. Mass).

1980-1981

Civil Liberties Union of Massachusetts, Board.

1980

Planned Parenthood League of Massachusetts Distinguished Service Award.

1977-1978

First Vice President, Civil Liberties Union of Massachusetts.

Beacon Press School Integration Studies.

1975-1977

Council, Committee on Legal Services to the Poor, Boston Bar Association.

1974-1975

Women's Rights Project, Civil Liberties Union of Massachusetts, founder and Steering Committee member.

Advisory Board, Center for Women's Legal Studies.

AMERICAN BAR ASSOCIATION
STANDING COMMITTEE ON FEDERAL JUDICIARY

WAIVER OF CONFIDENTIALITY

I hereby waive the privilege of confidentiality with respect to any information which concerns me, including any complaints erased by law, and is known to, recorded with, on file with or in the possession of any governmental, judicial, disciplinary, investigative or other official agency, Board of Bar Overseers,* or any educational institution, or employer, and I hereby authorize a representative of the American Bar Association Standing Committee on Federal Judiciary to request and to receive any such information.

**

Sandra L. Lynch
Sandra L. Lynch
Sandra Lea Lynch

Aug. 16, 1994
8/4/94
Date

* Please insert the name of the appropriate state or federal authority, e.g. Board of Bar Overseers, Commission on Judicial Conduct, etc.

** Please type or print name under signature line.

J.S. Department of Justice
Immigration and Naturalization Service

 OMB No. 1115-0136
Employment Eligibility Verification

Please read instructions carefully before completing this form. The instructions must be available during completion of this form. **ANTI-DISCRIMINATION NOTICE.** It is illegal to discriminate against work eligible individuals. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because of a future expiration date may also constitute illegal discrimination.

Section 1. Employee Information and Verification. To be completed and signed by employee at the time employment begins

Print Name: Last	First	Middle Initial	Maiden Name
Address (Street Name and Number)		Apt. #	Date of Birth (month/day/year)
City	State	Zip Code	Social Security #

I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.

I attest, under penalty of perjury, that I am (check one of the following):

☐ A citizen or national of the United States

☐ A Lawful Permanent Resident (Alien # A _____)

☐ An alien authorized to work until ____/____/____ (Alien # or Admission # _____)

Employee's Signature _____ Date (month/day/year) _____

Preparer and/or Translator Certification. (To be completed and signed if Section 1 is prepared by a person other than the employee.) I attest, under penalty of perjury, that I have assisted in the completion of this form and that to the best of my knowledge the information is true and correct.

Preparer's/Translator's Signature _____ Print Name _____

Address (Street Name and Number, City, State, Zip Code) _____ Date (month/day/year) _____

Section 2. Employer Review and Verification. To be completed and signed by employer. Examine one document from List A OR examine one document from List B and one from List C as listed on the reverse of this form and record the title, number and expiration date, if any, of the document(s)

List A	OR	List B	AND	List C
Document title: _____	OR	_____		_____
Issuing authority: _____		_____		_____
Document #: _____		_____		_____
Expiration Date (if any): ____/____/____		____/____/____		____/____/____
Document #: _____		_____		_____
Expiration Date (if any): ____/____/____		_____		_____

CERTIFICATION - I attest, under penalty of perjury, that I have examined the document(s) presented by the above-named employee, that the above-listed document(s) appear to be genuine and to relate to the employee named, that the employee began employment on (month/day/year) ____/____/____ and that to the best of my knowledge the employee is eligible to work in the United States. (State employment agencies may omit the date the employee began employment).

Signature of Employer or Authorized Representative	Print Name	Title
Business or Organization Name		Date (month/day/year)
Address (Street Name and Number, City, State, Zip Code)		

Section 3. Updating and Reverification. To be completed and signed by employer

A. New Name (if applicable)	B. Date of rehire (month/day/year) (if applicable)
C. If employee's previous grant of work authorization has expired, provide the information below for the document that establishes current employment eligibility.	
Document Title: _____	Document #: _____
Expiration Date (if any): ____/____/____	
I attest, under penalty of perjury, that to the best of my knowledge, this employee is eligible to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.	
Signature of Employer or Authorized Representative	Date (month/day/year)

U.S. Department of Justice
Immigration and Naturalization Service

OMB No. 1515-0136
Employment Eligibility Verification

INSTRUCTIONS

PLEASE READ ALL INSTRUCTIONS CAREFULLY BEFORE COMPLETING THIS FORM.

Anti-Discrimination Notice. It is illegal to discriminate against any individual (other than an alien not authorized to work in the U.S.) in hiring, discharging, or recruiting or referring for a fee because of that individual's national origin or citizenship status. It is illegal to discriminate against work eligible individuals. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because of a future expiration date may also constitute illegal discrimination.

Section 1 - Employee. All employees, citizens and noncitizens, hired after November 6, 1986, must complete Section 1 of this form at the time of hire, which is the actual beginning of employment. The employer is responsible for ensuring that Section 1 is timely and properly completed.

Preparer/Translator Certification. The Preparer/Translator Certification must be completed if Section 1 is prepared by a person other than the employee. A preparer/translator may be used only when the employee is unable to complete Section 1 on his/her own. However, the employee must still sign Section 1 personally.

Section 2 - Employer. For the purpose of completing this form, the term "employer" includes those recruiters and referrers for a fee who are agricultural associations, agricultural employers, or farm labor contractors.

Employers must complete Section 2 by examining evidence of identity and employment eligibility within three (3) business days of the date employment begins. If employees are authorized to work, but are unable to present the required document(s) within three business days, they must present a receipt for the application of the document(s) within three business days and the actual document(s) within ninety (90) days. However, if employers hire individuals for a duration of less than three business days, Section 2 must be completed at the time employment begins. **Employers must record:** 1) document title; 2) issuing authority; 3) document number; 4) expiration date, if any; and 5) the date employment begins. Employers must sign and date the certification. Employees must present original documents. Employers may, but are not required to, photocopy the document(s) presented. These photocopies may only be used for the verification process and must be retained with the I-9. **However, employers are still responsible for completing the I-9.**

Section 3 - Updating and Reverification. Employers must complete Section 3 when updating and/or reverifying the I-9. Employers must reverify employment eligibility of their employees on or before the expiration date recorded in Section 1. Employers **CANNOT** specify which document(s) they will accept from an employee.

- If an employee's name has changed at the time this form is being updated/ reverified, complete Block A.
- If an employee is rehired within three (3) years of the date this form was originally completed and the employee is still eligible to be employed on the same basis as previously indicated on this form (updating), complete Block B and the signature block.

- If an employee is rehired within three (3) years of the date this form was originally completed and the employee's work authorization has expired or if a current employee's work authorization is about to expire (reverification), complete Block B and:
 - examine any document that reflects that the employee is authorized to work in the U.S. (see List A or C),
 - record the document title, document number and expiration date (if any) in Block C, and
 - complete the signature block.

Photocopying and Retaining Form I-9. A blank I-9 may be reproduced provided both sides are copied. The instructions must be available to all employees completing this form. Employers must retain completed I-9s for three (3) years after the date of hire or one (1) year after the date employment ends, whichever is later.

For more detailed information, you may refer to the INS Handbook for Employers, (Form M-274). You may obtain the handbook at your local INS office.

Privacy Act Notice. The authority for collecting this information is the Immigration Reform and Control Act of 1986, Pub. L. 99-603 (8 U.S.C. 1324a).

This information is for employers to verify the eligibility of individuals for employment to preclude the unlawful hiring, or recruiting or referring for a fee, of aliens who are not authorized to work in the United States.

This information will be used by employers as a record of their basis for determining eligibility of an employee to work in the United States. The form will be kept by the employer and made available for inspection by officials of the U.S. Immigration and Naturalization Service, the Department of Labor, and the Office of Special Counsel for Immigration Related Unfair Employment Practices.

Submission of the information required in this form is voluntary. However, an individual may not begin employment unless this form is completed since employers are subject to civil or criminal penalties if they do not comply with the Immigration Reform and Control Act of 1986.

Reporting Burden. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. Often this is difficult because some immigration laws are very complex. Accordingly, the reporting burden for this collection of information is computed as follows: 1) learning about this form, 5 minutes; 2) completing the form, 5 minutes; and 3) assembling and filing (recordkeeping) the form, 5 minutes; for an average of 15 minutes per response. If you have comments regarding the accuracy of this burden estimate, or suggestions for making this form simpler, you can write to both the Immigration and Naturalization Service, 425 I Street, N.W., Room 5304, Washington, D. C. 20536; and the Office of Management and Budget, Paperwork Reduction Project, OMB No. 1515-0136, Washington, D.C. 20503.

LISTS OF ACCEPTABLE DOCUMENTS

LIST A

Documents that Establish Both Identity and Employment Eligibility

1. U.S. Passport (unexpired or expired)
2. Certificate of U.S. Citizenship (INS Form N-560 or N-561)
3. Certificate of Naturalization (INS Form N-550 or N-570)
4. Unexpired foreign passport, with I-551 stamp or attached INS Form I-94 indicating unexpired employment authorization
5. Alien Registration Receipt Card with photograph (INS Form I-151 or I-551)
6. Unexpired Temporary Resident Card (INS Form I-688)
7. Unexpired Employment Authorization Card (INS Form I-688A)
8. Unexpired Reentry Permit (INS Form I-327)
9. Unexpired Refugee Travel Document (INS Form I-571)
10. Unexpired Employment Authorization Document issued by the INS which contains a photograph (INS Form I-688B)

OR

LIST B

Documents that Establish Identity

1. Driver's license or ID card issued by a state or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, sex, height, eye color, and address
 2. ID card issued by federal, state, or local government agencies or entities provided it contains a photograph or information such as name, date of birth, sex, height, eye color, and address
 3. School ID card with a photograph
 4. Voter's registration card
 5. U.S. Military card or draft record
 6. Military dependent's ID card
 7. U.S. Coast Guard Merchant Mariner Card
 8. Native American tribal document
 9. Driver's license issued by a Canadian government authority
- For persons under age 18 who are unable to present a document listed above:**

10. School record or report card
11. Clinic, doctor, or hospital record
12. Day-care or nursery school record

AND

LIST C

Documents that Establish Employment Eligibility

1. U.S. social security card issued by the Social Security Administration (other than a card stating it is not valid for employment)
2. Certification of Birth Abroad issued by the Department of State (Form FS-545 or Form DS-1350)
3. Original or certified copy of a birth certificate issued by a state, county, municipal authority or outlying possession of the United States bearing an official seal
4. Native American tribal document
5. U.S. Citizen ID Card (INS Form I-197)
6. ID Card for use of Resident Citizen in the United States (INS Form I-179)
7. Unexpired employment authorization document issued by the INS (other than those listed under List A)

Illustrations of many of these documents appear in Part 8 of the Handbook for Employers (M-274)

Withdrawal/Redaction Marker

Clinton Library

DOCUMENT NO. AND TYPE	SUBJECT/TITLE	DATE	RESTRICTION
008. form	re: Financial statements (7 pages)	08/02/1994	P6/b(6)

COLLECTION:

Clinton Presidential Records
Counsel Office
Victoria Radd
OA/Box Number: 4961

FOLDER TITLE:

Sandra Lynch CA1-MA [Court of Appeals for the 1st Circuit-Massachusetts] Forms [3]

2013-0670-F

jm1014

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]

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE

BOSTON, MASSACHUSETTS 02109

TELEPHONE: (617) 482-1390

FACSIMILE: (617) 482-7347

TELEX 940693

FACSIMILE COVER SHEET

DATE: 9/11/94TO: Preeti Bansal, Esq.DOMESTIC FAX #: 202-456-11647INTERNATIONAL FAX #: 011

COUNTRY CODE

CITY CODE

FAX NUMBER

CONFIRMATION # 202-456-7804CLIENT SYMBOL-CASE #: 90245.15FROM: Sandra LynchEXT: 5031USER #: 113TOTAL PAGES SENT: 2

(INCLUDING COVER SHEET)

COMMENTS

Here is the press report I mentioned. I don't know if this qualifies as a speech. I do not believe I had a prepared text and was only member of a panel.

IMPORTANT — PLEASE READ!

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS NAMED ABOVE. THIS MESSAGE MAY BE AN ATTORNEY-CLIENT COMMUNICATION AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR AN AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT YOU HAVE RECEIVED THIS DOCUMENT IN ERROR, AND THAT ANY REVIEW, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US BY MAIL. THANK YOU.

IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION

PLEASE TELEPHONE US AT (617) 482-1390 EXT:



5326 ...17TH FLOOR



4109 ...18TH FLOOR



2214 ...20TH FLOOR

FOLEY, HOAG & ELIOT

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IN WASHINGTON, D.C.

1815 L STREET, N.W.

SUITE 850

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0600

SANDRA L. LYNCH

September 13, 1994

FEDERAL EXPRESS

Preeta Bonsal, Esq.
The White House Counsel's Office
Room 128 - Old Executive Office Bldg.
Washington D.C. 20500

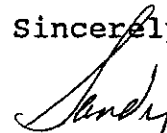
Dear Preeta:

Enclosed please find three (3) copies of the completed Committee on the Judiciary Questionnaire for Judicial Nominees and publications.

I have completed the AO-10 save for the date and signature and will get that to you as soon as you advise me I may sign it.

Thank you for all your courtesy and assistance.

Sincerely,



Sandra L. Lynch

/sav
enc.

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE

BOSTON, MASSACHUSETTS 02109-2170

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IN WASHINGTON, D.C.

1615 L STREET, N.W.

SUITE 850

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0600

SANDRA L. LYNCH

September 16, 1994

FEDERAL EXPRESS

Preeta Bansal, Esq.
The White House Counsel's Office
Room 128 - Old Executive Office Bldg.
Washington D.C. 20500

Dear Preeta:

Enclosed please find the original and 13 copies of the
Committee on the Judiciary Questionnaire for Judicial Nominees
dated September 19, 1994.

Once again, thank you for all your courtesy and assistance.

Sincerely,


Sandra L. Lynch

/sav
enc.

COPY

FOLEY, HOAG & ELIOT

ONE POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109

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1615 L STREET, N.W.

WASHINGTON, D.C. 20036

TELEPHONE (202) 775-0600

TELECOPIER (202) 857-0140

SANDRA L. LYNCH

DETERMINED TO BE AN
ADMINISTRATIVE MARKING

INITIALS: JAM DATE: 8/20/13
2013-0670-F

~~CONFIDENTIAL~~

August 5, 1994
FEDERAL EXPRESS

Victoria Radd, Esquire
Associate Counsel to the President
The White House
Office of Legal Counsel
Second Floor, West Wing
Washington, D.C. 20500

RE: United States Court of Appeals for the First Circuit

Dear Ms. Radd:

At the suggestion of Jeff Blattner, I am forwarding to you the following information:

1. FBI clearances
 - a. An original and three copies of the Questionnaire for Sensitive Positions (SF-86) and Supplement (SF-86A) and attachments;
 - b. One original and three copies of The White House clearance memo;
 - c. Two copies of the tax check waiver;
 - d. Two signed and printed fingerprint charts.
2. Draft ABA Personal Data Questionnaire. I am forwarding the writing samples requested by the ABA under separate cover. ✓
3. Draft Senate Judiciary Questionnaire, without writing samples.
4. Justice Department Information Requested of Prospective Judicial Nominee, including financial statement and

page 2
Victoria Radd, Esq.
August 5, 1994

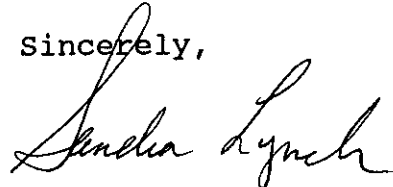
COPY

federal tax returns for the years 1991, 1992 and 1993.

I will forward to you the Justice Department Medical Condition form under separate cover when it is completed.

Thank you for assistance with this.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sandra Lynch".

Sandra L. Lynch

/sav
enc.