

MEMO TO FILE

RE: RONNIE KIMBLE / MEETING WITH JOE WILLIAMS

DATE: DECEMBER 2, 1997

On December 1, 1997 I spoke briefly with Joe Williams with regard to Patrick Pardee. Joe said he had not debriefed Patrick and did not have any first hand knowledge of the extent of his cooperation and various allegations that Patrick is going to give.

Joe said Panosh had approached him several times about Pardee but he and Pardee have not entered into any real cooperation agreement. Joe said he was very dissatisfied with the large number of indictments brought against Pardee. Joe's position is that if Pardee is willing to be a material witness in the first degree murder case, then he should be given some concession commensurate with his cooperation.

Joe said that if Patrick Pardee took the witness stand in Kimble's case, he could be very sure that he had been given an extensive, favorable agreement and as of this date he has not been given any such thing.

Joe asked the questions of Panosh: Why should Patrick Pardee cooperate since he was only looking at a group of Class H felonies and had no criminal record. Also he had cooperated by admitting his involvement in the larcenies. What Superior Court judge is going to do anything but put him on intensive probation anyway? So why should Patrick Pardee give a bunch of testimony against Ted Kimble?

Joe said he is aware that Pardee has apparently told Panosh that Ted admitted to him that he had paid Ronnie to get rid of Patricia. However, Pardee does not have any first hand knowledge of anything Ronnie may have said or done.

Although Panosh will probably ultimately compel Nichols and Pardee to testify it would appear at this point in time he does not have control of either of these witnesses. Nor does Panosh have any first hand knowledge of Mitch Whidden as a witness. Panosh is pretending to put our feet to the fire but the fact is he has a great deal of preparation to do himself. This cuts two ways for us in my opinion. Perhaps we should make a real effort

to be ready on March 2 and simply get this whole case behind us. The biggest hurdle we face is presenting the defendants themselves and their immediate family in an effective and professional way. That has always been the most difficult objective we have and it will be hard to determine how much time it will take to get the witnesses ready.