

FILED *Feb. 4, 1969*  
J. A. BLACKWELL, CLERK  
BY *J. C. Cohen* D. C.

*ok*  
*2a*

IN THE CRIMINAL COURT OF SHELBY COUNTY, TENNESSEE  
Division III

STATE OF TENNESSEE |  
Vs. | Nos. 16645 and 16819  
JAMES EARL RAY |

TO SAID HONORABLE COURT:

COMES NOW, James Earl Ray, Defendant, and files this his motion to be permitted to confer with WILLIAM BRADFORD HUIE, in support of which motion he would respectfully show the Court:

I.

The said William Bradford Huie is an author who has had contractual relations with this Defendant since the early part of July, 1968, pursuant to which some \$30,000.00 was paid by said author to a former attorney for this Defendant. A disagreement arose between this Defendant and said former attorney resulting in the release of said attorney by said Defendant and likewise the release of the case by said attorney. But no part of the \$30,000.00 theretofore paid by said Author to said former attorney was released or returned to this Defendant by said former attorney.

II.

A number of questions have arisen with reference to several provisions of the contracts, assignments, etc., which require discussion and conference between this Defendant and the said Wm. Bradford Huie, in order to obviate a misunderstanding and to adjust to the changes that have taken place with reference to the case and the parties since the original contracts were signed. This Defendant hopes to have available additional funds from the said Wm. Bradford Huie, but whether or not they are available the protection of this Defendant's contractual rights necessitate a detailed discussion and explanation and understanding that can only be accomplished by a discussion between said author and this defendant.

### III.

Defendant says that the maximum security facilities through which he has been compelled to talk with all visitors except his attorneys will not permit adequate discussion, understanding or adjustment of the terms of the existing or any future contracts. In the first place, there is no privacy. A person is required to talk through a metal network and to look through a 7" diamond shaped thick glass. Both vision and hearing is grossly impaired. One is required, to be heard ever so faintly, to shout so that his voice and words can be clearly heard over most of the entire floor. Even then, only occasional spoken words can be heard clearly. The facilities heretofore available to such visitors is calculated to create a further misunderstanding rather than to explain and thereby solve the present matters for discussion. Therefore, Defendant says that an arrangement should be ordered that will permit a personal, unimpeded conference between himself, his present attorney and the said Wm. Bradford Huie, either in Defendant's cell or else in the Court room or an anteroom thereto.

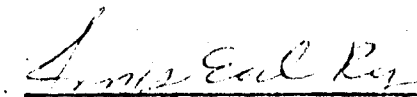
Defendant says that three people can not carry on a conversation through the metal wire complex and glass heretofore described. That each person has to put his ear against the metal complex in order to distinguish any speech on the opposite side and there is not room for two heads against the metal complex or tube at one time. That Defendant needs the advice of his attorney as he talks with the said Wm. Bradford Huie and in advance of any conversation or answers to questions from the said author.

Defendant says that three or four hours will be, in his estimation, required for the discussion contemplated between him and the said Wm. Bradford Huie.

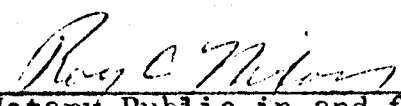
WHEREFORE, premises considered, Defendant prays that the Court enter an order directing that he be permitted free and uninterrupted and unimpeded conference and confrontation with the said Wm. Bradford Huie for such period of time as is necessary to discuss and come to an understanding concerning the provisions of several contracts

and agreements heretofore entered into between them and the amendments thereto and interpretation thereof necessary as a result of the change in attorneys and the parties to said contracts.

Respectfully submitted,

  
\_\_\_\_\_  
James Earl Ray.

SUB SCRIBED and sworn to at Memphis, Shelby County, Tennessee  
this 3rd day of February, A. D., 1969.

  
\_\_\_\_\_  
Notary Public in and for Shelby  
County, Tennessee.

My commission expires April 23, 1969.

26

ORDER

The foregoing motion to permit a conference with a party with whom he has a contractual relation and business dealing having been presented to and considered by the Court this \_\_\_\_\_ day of February, A.D., 1969, the same is:

GRANTED subject to the order this day entered with relation thereto.

OVERRULED AND DENIED, to which action of the Court in overruling and denying said motion the defendant, by counsel, then and there excepted, and said motion, together with this ruling thereon and defendant's exception are ordered filed as a part of the record of this case.

\_\_\_\_\_  
W. PRESTON BATTLE, JUDGE  
CRIMINAL COURT, Division III  
Shelby County, Tennessee