

JOHN P. MANNING

ATTORNEY AT LAW

8196 S.W. HALL BLVD., SUITE 344

BEAVERTON, OREGON 97008

(503) 520-9130

Fax: (503) 520-9238

January 8, 1998

Ms Dagne Thomson
P.O. Box 487
Gaston, OR 97119

Dear Dagne:

It was good to brainstorm with you the other night. Unfortunately, I haven't had much time to contemplate the potential penalty phase evidence and theories.

Therefore, I need you to advise me in writing as to your theories, themes, witnesses that you believe we should concentrate on. I know we have, thankfully, Dr. Cunningham in our corner; further we will be bringing in former prison officials who spoke highly of Billy. I also need you to interview former employers, such as Gerald Hill at Keith Brown, the Jubitz employer, Mercer Industries employer etc.

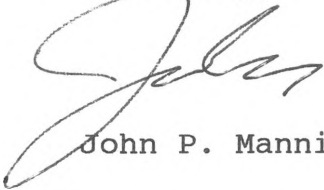
I hope to have something from you on Saturday. If you put your ideas in writing it would be must appreciated as the spoken word is often lost on me.

We have to assume that there will be a penalty phase.

Also, don't forget Dr. Leong on Shamsudden and his history. He comes from a large family which you will find interesting.

Thanks for all your help.

Sincerely,



John P. Manning

P.S. I put in for your authorization