

UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA, )  
 )  
 *Plaintiff,* )  
 )  
 v. )  
 )  
 CITY OF STILWELL, OKLAHOMA, )  
 ET AL., )  
 )  
 *Defendants.* )

Case No. CIV 96-196 B

SUPPLEMENT TO UNITED STATES' MOTION TO  
COMPEL PRODUCTION OF CERTAIN ORIGINAL AUDIO TAPES

On February 24, 1998, the United States filed a motion to compel defendants to produce certain original audio tapes for use at trial. In their opposition, defendants suggested that they did not need to produce the tapes, in part, because they were "agreeable to allowing" the United States "reasonable access to [defendants'] records and documents, including the original tapes." *See* Defs. Response at 6 (filed March 3, 1998). In considering the motion to compel, the Court should be aware, as evidenced by the attached letters, that defendants have now refused the United States access to inspect any tapes of their city council or utility

board meetings, even though such tapes are otherwise publicly available under Stilwell's own City Charter. *See* Art. XI, § 123(b).

Respectfully submitted,

---

John R. Read  
Michele B. Cano  
Michael D. Billiel  
Attorneys  
United States Department of Justice  
Antitrust Division  
325 Seventh Street, N.W., Suite 500  
Washington, D.C. 20530  
(202) 307-0468

March 15, 2004