HOWARD, LEWIS & PETERSEN
ATTORNEYS AND COUNSELORS AT LAW
DELPHI BUILDING
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JACKSON HOWARD
S. REX LEWIS
DON R. PETERSEN
CRAIG M. SNYDER
JOHN L. VALENTINE
RICHARD B. JOHNSON

AREA CODE 801
TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.
8318

June 22, 1981

Dr. Frank Craighead
Box 156
Moose, Wyoming 83012

RE: Ford v. U.S.A.

Dear Dr. Craighead:

The referenced case has been settled. We will not proceed with the trial and, therefore, will not need your testimony.

I do want to thank you for your help in this matter. I don't think we would have been able to settle the case without your assistance. Your willingness to assist us has been greatly appreciated. On a personal note, it is good to know that somebody is willing to stand up and state what they believe. So many times when we go into court, witnesses will not become involved. Rather they prefer to set back and let someone else carry the burden.

Perhaps some good has come out of this case that will enhance the preservation of grizzly bears. If that is so, I'm sure it is because of your willingness to become involved.

Once again, I thank you for your help. Should there be additional costs, please send me a bill.

Very truly yours,

HOWARD, LEWIS & PETERSEN

DON R. PETERSEN

DRP/dp

FC file

P.O. Box 156
Moose, Wy. 83012
December 19, 1980

Howard, Lewis, and Petersen, Attorneys at Law
Delphi Bldg., 120 East 300 North Street
Provo, Ut. 84601

Att'n.: Mr. Don R. Petersen

Dear Mr. Petersen:

I received your letter of November 4 concerning the Melvin Ford trial, but have delayed answering as I will have to change my work schedule in order to be available in late April. I am also concerned over the government's request to examine notes and data. This will surely take a great deal of time prior to the trial; and, as I have indicated to you, most of the data is filed in Missoula. If the government lawyers insist on going through this data, how will this process be expedited? Will they make lists of information that they would like to see, or will they just want to rummage through everything available? I'd also be interested to know if they will have to reassemble and refile the information, thus arranging it in the same condition they found it.

It seems to me that a similar request should be made by you to the Interagency Research Team and to the Park Service whose combined people have been working on grizzly bear research and management, since the closing of the dumps in 1969, 1970 and 1971. I believe that this is the only way that full information can be obtained relative to the grizzly bear situation prior and subsequent to the attack on Mr. Ford. I am sending a copy of your letter and my reply to my brother, John, in order to alert him to the situation.

Sincerely,

Frank C. Craighead Jr.

Frank Craighead

FC:kf

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AREA CODE 801
TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.

January 7, 1981

Dr. Frank Craighead
P.O. Box 156
Moose, Wyoming 83012

Re: Melvin Ford

Dear Dr. Craighead:

I appreciate your letter of December 19, 1980. Any costs and expenses incurred in connection with going through the data that you referred to would have to be paid by the government. They will not be at liberty to rummage through everything available and everything would have to be placed in a neat an orderly manner after examining it.

It surely represents an inconvenience that the government is trying to put us through. I have not heard from them lately in regards to this request and perhaps they are not pushing it at this time.

I think your suggestion on the Interagency Research Team has merit. We have asked for similar type information from them, one of the problems we have run in to is a complete lack of information and data that they have kept or stored.

The question in regards to going through the information in Montana boils down to closing of the garbage dumps. As you are aware the case in California ruled in effect that the closing of the garbage dump was an issue that was of discretionary nature and therefore is not a basis for initiating legal action. The government made a similar motion to dismiss in the Utah Federal Cout which motion was dismissed. That did not lay to rest completely that issue, however, and the Court left the issue open to be brought at a later date, if the government wants to refile and they have refiled a motion specifically concerning the closing of the garbage dump. Even if we do not prevail on that issue we still have plenty of other issues to go forward on at the time of the trial.

Your help in this matter is greatly appreciated.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:jcw

file FCC

HOWARD, LEWIS & PETERSEN
ATTORNEYS AND COUNSELORS AT LAW
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AREA CODE 801
TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.

November 4, 1980

Mr. Frank Craighead
Box 156
Moose, Wyoming 83012

Re: Melvin Ford v. United States of America

Dear Mr. Craighead:

The referenced matter is set for trial for the 27th day of April, 1980. We have had some difficulties in getting this matter set for trial. That day looks firm and I expect no further delays.

As you are probably aware, there is some question over what amounts to a discretionary function. Anything that is a discretionary function performed by a government employee bars us from recovery. The government has previously moved to dismiss the case on the basis that the handling of grizzly bears is completely a discretionary function. That motion was denied by the Court. The government has re-introduced the motion as it pertains to the closing of garbage dumps claiming that that and that solely is a discretionary function. I expect the Court to rule on that motion before the 1st of the year. If the government should deny that motion we will then be free to proceed with testimony as to the closing of the garbage dump. In that event the government has asked that they examine the notes and data from which you prepared your studies and findings. We moved the court to prohibit the government from digging into this information telling them that the information as we understand it was basically contained in Montana, would be very difficult to find, would be very costly to dig-out so the Court ruled that they are entitled to this information but that the government would have to pay all costs invovled in obtaining it. This would be costs for your time and such other peoples time as may be involved and such other costs that may be incident to obtaining this information.

I wanted to alert you as to these matters and we would appreciate your testifying in court in April in Salt Lake City and also as to any further pre-trial discovery that may be appropriate. As explained above, the Court has ordered the government to pay for any pre-trial discovery. Our client shall expect to pay your usual fee in regards to your testimony in Salt Lake City as well as the costs and so forth in coming to Salt Lake.

You probably have questions and I would be pleased to review this matter with you at any time.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:jcw
cc: Melvin Ford

HOWARD, LEWIS & PETERSEN
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OUR FILE NO.

May 13, 1980

Dr. Frank Craighead
P.O. Box 156
Moose, Wyoming 83012

Re: Melvin Ford vs: United States of America

Dear Dr. Craighead:

There has once again been a continuance of the referenced case. It is no longer set for June of 1980, but has been continued to April 27th, 1981. This is a long ways away from trying a case; it is unfortunate that the court had to continue it, because of scheduling conflicts. We are still interested in obtaining a testimony sometime during that week. Our office will contact you as to the exact time and fit in to your schedule as best we can.

You probably have question, I would appreciate hearing from you.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP/klr

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OUR FILE NO.

March 11, 1980

Dr. Frank Craighead
Box 156
Moose, Wyoming 83012

Re: Melvin Ford

Dear Dr. Craighead:

The case of Mr. Melvin Ford has been set for trial on the 9th day of June, 1980, in the Federal Court in Salt Lake City, Utah. We would like for you to testify in regards to this matter. I would expect that your testimony would be either on the afternoon of the 9th of June, the 10th or the 11th. We would like to accomodate your schedule as best as we can in scheduling your testimony.

I would appreciate hearing from you as to your availability to testify in regards to this case and the best time for you to testify.

Our client shall expect to pay your usual fee in testifying on behalf of Mr. Ford.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:jcw

HOWARD, LEWIS & PETERSEN
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TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.

February 29, 1980

DR. FRANK C. CRAIGHEAD
Box 158
Moose, Wyoming 83012

RE: Melvin Ford vs. United States

Dear Dr. Craighead:

I am sorry to hear about the condition of your wife. She is a very lovely lady and was a very gracious hostess when I met with her in your home. Please extend her my best wishes.

I can certainly understand the problem in reviewing your deposition. The reference matter has been set for trial beginning on the 9th day of June, 1980, in Salt Lake City, Federal Court. If at all possible we would like you to testify on that date or sometime during the week. I realize the difficulty this may present. Any help you could be to us will be greatly appreciated.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP/eah

HOWARD, LEWIS & PETERSEN
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P. O. BOX 778

OUR FILE NO.
8318

December 26, 1979

DR. FRANK CRAIGHEAD
Box 156
Moose, Wyoming 83012

RE: Melvin Ford vs. United States of America

Dear Dr. Craighead:

The United States goverment made a motion to dismiss our case on the grounds that the acts of the park service were a discretionary function and therefore exempt from the Federal Tort Claims Act. The Court ruled in our favor and against the government.

It is now necessary for us to put the matter back again on the trial calendar. Hopefully, we will be receiving a trial date in the very near future.

We appreciate your help in this matter.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP/eah

sent card
2/22/80

HOWARD, LEWIS & PETERSEN
ATTORNEYS AND COUNSELORS AT LAW
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TELEPHONE 373-6345
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OUR FILE NO.

September 11, 1979

Dr. Frank Craighead
P. O. Box 156
Moose, Wyoming 83012

Re: Melvin Ford vs. United States of America

Dear Dr. Craighead:

The referenced matter will not be tried on the 22nd day of October, 1979. The Government recently brought a third-party action against the Reeses. This is the daughter and son-in-law on a theory that they should not have left the cooler out and therefore they are liable. Their attorney has just recently got into the case. They have further made a motion for summary judgment on the grounds that under this situation the Government is not liable for their acts. In light of these motions and new parties being brought into the action, the Court continued the case.

I expect that the matter will be re-set for trial sometime after the first of the year 1980. We would like to have you testify at the time the case is re-set for trial. Your help and interest in this case has been appreciated. We will be in touch with you. In the meantime should there be any questions, please let me know.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:plb

Box 156
Moose, Wyoming 83012
June 27, 1979

Mr. Don R. Petersen
Delphi Building
120 E. 300 N.
Provo, Utah 84601

Dear Don:

In looking over material you sent me and in preparing for the deposition I put in the following time:

April 9 & 10	2 hrs.	
June 13	3	
June 15	2	
June 18	1	
June 19	2.5	
	10.5 hrs @ $40.00/hr.	$420.00

The bill to the government for deposition is:

June 20	8 hrs. @ $60.00/hr.	$480.00

Sincerely,

Frank Craighead

Don R. Petersen
Delphi Bldg.
120 East 300 north St.
Provo, Utah 84601

Dear Don,

In preparing for the deposition & looking over material you sent me and in I put in the following time:

April 9 & 10 — 2 hrs
June 13 — 3 hrs
June 15 — 2 hrs
June 16 — 1 hr
June 19 — 2.5 hrs

Total 10.5 hrs at $40.00/hr — $420

The bill to the Government for deposition is;
June 20 — 8 hrs — at $60.00/hr — $480

Sincerely,
Frank Douglass

Deposition from F.B.C. week end
Back to Peterson Sat or Mon
Last week in June —
Trial date — Sept. 10.

April 9
1.5 hrs going over material
½ hr — April 10
Prep. & phone call to Peterson

June 13
3 hrs going over material
& making notes

June 15
2 hrs

June 18 — 1 hr
June 19 — 2.5 hrs @ 40
June 20 — 8 hrs @ 60

10.5
40
420

HOWARD, LEWIS & PETERSEN
ATTORNEYS AND COUNSELORS AT LAW
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JOHN L. VALENTINE

AREA CODE 801
TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.

March 19, 1979

Dr. F. G. Craighead, Jr.
c/o S. F. Craighead, Sr.
50 Gables Boulevard
Apartment #3
Naples, Florida 33492

or

Dr. Frank Craighead
Box 156
Moose, Wyoming 83012

Dear Dr. Craighead:

This letter is written as a recent follow-up to our telephone conversation of a few weeks ago. We are in need of an expert witness in regard to this case. Someone who could evaluate the documents that we have received from the Park Service and state their expert opinion as to whether or not the park service managed this bear in a proper manner. There are other collateral issues that would be involved that would not be as important as an analysis of the record. The other issues being the closing of the garbage dumps and so forth. But I think our best position in this case is to show from their own records that they did not properly manage the grizzly bear in question.

You should have in your records some of the information that we have obtained from the government. If you do not I am enclosing some additional information. One record is entitled the record of grizzly sow and you will note that on the notations under 1976 8/14, and 8/15 they are telling us that traps were set trying to catch the bear. In other words, they were setting out traps in the camping areas to attract the bear. I have enclosed for your records that information as well as other information that gives us a history of all the problems they have had with that particular bear over the years.

I recently met with Mr. Kirkley in Logan, Utah and reviewed with him his knowledge of this incident. I believe you have in your records his letter that he wrote to you. There is just no question that there was a high activity of bears around that fish trap. He showed to me some plaster casts that he had made of bear tracks, large imprints left in the ground. He stated that the old and sick trout were removed from the fish trap and not disposed of but would be left on the banks. He said it was common to see pelicans and ravens being attracted to the dead fish.

Mr. Kirkley was also concerned about the garbage pickup. He indicated that in this individual campground, that garbage pickup ended about 4:30, and that there was no other pickup until morning. Most of the campers arrived in the camp ground in the afternoon or early evening. This meant a large amount of garbage was left in the camping area. He would notice between 8 and 8:30 in the evening, the cans were just jammed full of garbage. He had occasion to write to superintendent Townsley a letter. A copy of his letter and the response is included herein. I think that his comments are timely.

While in Logan, I also met with a Dr. Barrie K. Gilbert. You may remember this was the man that was malled by a grizzly bear in Yellowstone Park. He was performing a study for the park service on black bears. He said he was working both in Yellowstone and in Yosemite. He is still continuing his study of black bears. He lost his left eye and part of his face. He has suffered some very permanent damages as a part of the bear malling. After our conversation, he sent to me some information and I am enclosing that as well. Note the memorandum prepared by Mary Margher. At the bottom of the first page, she refers to the grizzly bear that attached Mr. Ford and states that the bear was "known to be aggressive". She is stating in effect that this one female grizzly bear was the biggest problem in the park.

On the second page in the last paragraph, she completely misrepresents what happened in regard to Mr. Ford. It is a fact that the ice chest was left out. It was shut tight and full of ice. There were no requests to remove the ice chests and he was not trying to drive away cubs at the time of the malling. This is a story that is made up by the park service and seems to become more embellished as time goes on.

The report that Dr. Gilbert sent from H. Starker Leipold is interesting particularly page 12 where he refers to the possibilities of legal liability. I would appreciate it if

you could look this information over and let me know if you would be in a position to help us. I do not expect we will have the confrontation that was had in the Walker case in California.

After you have had an opportunity to evaluate this information, please call me collect. Perhaps if you are going to be in Logan to visit with your son, we could meet there at a time that would be convenient for you. Once again, I want to thank you for your help.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:plb

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OUR FILE NO.

March 19, 1979

Dr. F. G. Craighead, Jr.
c/o S. F. Craighead, Sr.
50 Gables Boulevard
Apartment #3
Naples, Florida 33492

or

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Box 156
Moose, Wyoming 83012

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Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:plb

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AREA CODE 801
TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.

June 6, 1978

Dr. Frank Craighead
P. O. Box 156
Moose, Wyoming 83012

Dear Dr. Craighead:

This letter will acquaint you with some of the areas I wish you would explore with me when we meet on Friday.

Our case seems to fall into two relatively distinct areas: First, the negligence of the Park Service in closing the garbage dumbs in the manner they did, and second, their negligence in handling this particular bear, disregarding any particular pattern caused by other management practices.

The garbage dumps were closed in 1968-1970, despite your strong opposition based, it seemed to me, on general studies of the bears and an extrapotations from the 1939-1940 experience of the Park when bear feeding stations were closed down abruptly. Following that action there were numerous incidents and about 40 bears were killed. I cannot determine how long after the closing the bears continued to present a problem. We need to explore this to determine if our bear, whose bad habits may have started in 1973, can be linked to the closing of the garbage dumps.

In general our explorations in this area must be broad. Our present information only covers years to 1970 or 1971. We need to discover the number of bears involved and whether the problem continued through 1973, or better yet, through 1976. You might be able to tell us if older bears would train their cubs to seek out campsites, thus perpetuating the problem to later generations.

We must also examine the number of bear-human encounters, particularly since 1970. Has the number remained significantly higher since the closing of the dumps or has there been a tapering off of occurences? Is the decline greater than can be explained by the decrease in the absolute number of bears? If there is still a substantial problem, how has the Park Service modified their educational program and warning systems in order to protect the public better? Consistent with their theory that bears are good and people are bad, have they really been working on the problem from the people end or have they merely been regurgitating the same old problems

in slightly different form? In particular, was the public ever notified of the increased danger resulting from the closing of the dumps or was there any change at all before and after 1970 or thereabouts?

Food pressures on the bears may have been intensified by the closing of municipal dumps near Yellowstone. There were, apparently, two large dumps close to Yellowstone which were shut down in about 1971. If the Park Service put pressure on the municipalities to close those dumps in order to preserve their theory of what made bad bears, those actions might be attributable to the Service.

You have mentioned the baiting of black bears as a substantial food source for the Grizzly, and have argued against abruptly closing down that food source. You also indicated that the measure to ban baiting was defeated; why? Was it because of the pressure of sportsmen's groups or because the Wyoming legislature was more persuaded than the Park Service that people might get hurt?

We also have to consider the problem of smaller dumps and present waste disposal practices. Apparently there were two major dumps with numerous small dumps. If the main ones were closed down before the smaller ones, even garbage scavenging bears would be forced to move closer, to, not further from, humans. Their resistance to human contact would be weakened, even if, as you argue, scavenging in dumps did not completely accustom them to humans. Moreover, the chance of blundering into a camp would be increased. Our bear was apparently finding garbage and frequenting the "sewage pond" and "dry dump" around Fishing Bridge. There may be considerable substitution of minor dumps for the major ones when the major ones were shut down. This might have seriously agravated or extended the problem.

The situation was probably also affected by the manner of dumping garbage. You have indicated that the traditional pattern had been to bury the garbage lightly. This did not stop the bears by any means, but it did slow them down so that more bears would eat for a longer time (and therefore be out of the camp grounds) This was changed to merely dumping their garbage, which meant that a few bears got all of the edible garbage quickly. Similar methods of garbage disposal may be agravating the situation at the present time. For instance, although the garbage dumps are presently sealed off, are they still emitting odors which attract the bears, only to frustrate them with unobtainable food? Are they closer or further away from the camp sites?

In addition to garbage, we need to learn more about the Services' control of fish. Apparently at the time of the mauling, a Park Service crew had strewn dead fish from a broken trap on the bank near the camp grounds. Was this common? Are there other types of mishaps associated with running the park which might provide food for the bears and draw them into areas where humans would be? The Park Service might be maintaining a nuisance not only in the bears themselves, but in maintaining these conditions which excite and attract bears.

Charging that the Park Service was negligent in closing the garbage pits in the manner they did or in managing bears or in conducting other activities so as to incite the bears, requires us to challenge the assumptions and management techniques of the Park Service. This is especially true if we try to show a nuisance either in keeping dangerous animals or in maintaining conditions that would attract them. We must explore the basic assumption that there are two types of bears, wild and scavenger, and that the scavenger bears are a limited part of the population. You strongly deny this assumption. We need to look for figures that show that animals that don't come into dumps nevertheless show up in campgrounds about as frequently as those who do frequent dumps. You have pointed out that the Park Service's definition of a wild bear is very inappropriate: Anything sighted anywhere but in a garbage dump or right on a road, or in a developed area. Nevertheless, this definition might serve our purposes very well indeed. I doubt that one could come up with any significant statistical proof that there was a difference between "wild" and "scavenger" bears since that definition. We, or course, maintain that there is no difference until the animal starts going into the campgrounds and populated areas, and feed with humans present.

In addition to this basic philosophical difference, we seem to differ about practice with the Forest Service as well. We must explore the effectiveness of their transplantation techniques, in terms of miles, times and placement. Their budgetary restrains may be causing them to do a bad job. (Is that correct?) Or perhaps they just don't accept the idea that 60 to 80 miles is a minimum effective transport. We might discover if they transport consistently to particular areas, and whether there might not be a march of bears back into the populated regions with older, more experienced bears leading the newly transported ones.

In dealing with the specific bear in question, we can probably take a different attack. Instead of challenging their assumptions and practices, we may be able to accept them and say that they weren't followed. You have complained that many bears have been destroyed after only one or two contacts with man in campgrounds. There is probably some policy on this; we must find out what it is.

There appears to have been at least 6 contacts with our bear in campgrounds or other populated areas in 1973-74. In 1975 the bear drops out of sight. We must consider with you whether that is reasonable at all. Our bear appears to my unpracticed eye to be very predictable. We, therefore, must try to determine how our bear can be identified from the records with reasonable accuracy and will probably be forced to search the 1975 records ourselves. In addition, we may want to determine the age of the bear from the autopsy and other reports, if any. We may have to theorize that our bear was led to the campgrounds by her mother in 1969 and 1970 and thereby became accustomed to man as a direct result of the closing of the dumps. 4 1/2 is the average age for a sow to begin bearing, and the appearance of the sow and her cubs in 1973 would correspond with her being a yearling in 1970 or 1969, wouldn't it?

You might also give us some guidance about her increased activities and the size of her litter. Apparently she had litters of two cubs in 1973 and 1974 and had visited the campgrounds with reasonable frequency. In 1976 she had a litter of cubs and was visiting the campgrounds much more frequently. Shouldn't this increased need have been apparent? Do bears get more nervous, as people do, when the number of children they are caring for increases?

I would welcome any further suggestions you might have and look forward to meeting with you.

Sincerely,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP/mp

Man mauled by bear files suit

SALT LAKE CITY (UPI) — A man who was mauled by a grizzly bear in Yellowstone National Park has filed a $225,000 lawsuit against the federal government.

Melvin Ford of Salt Lake County filed suit in the U.S. District Court for Utah Thursday against the National Park Service.

Ford said a grizzly dragged him from the doorway of his camper at the Fishing Bridge campground in Yellowstone on Aug. 16, 1976. He said the animal carried him 60 feet into the forest and severely mauled him.

The suit alleges that the Park Service failed to enforce campground rules against leaving food where it could attract bears.

It claims that up until 1968, the Park Service maintained an open dump in the area. When the dump was closed, the bears began seeking out other sources of food elsewhere, including at the campground.

Fire damages buildings at Flagg Ranch

MORAN — A fire of undetermined origin has caused $75,000 damage to several unoccupied buildings at Flagg Ranch at the south gate of Yellowstone National Park.

Gutted last Saturday were seven dormitory and apartment units. Firemen from Grand Teton National Park and Jackson responded to the alarm and took two hours to extinguish the blaze in the old wooden structures.

Jackson Fire Chief Rex Lancaster said that no cause have been found for the blaze and the investigation is continuing.

Casper Star-Tribune Sat. Apr. 8, 1978

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AREA CODE 801
TELEPHONE 373-6345
P. O. BOX 778

OUR FILE NO.

April 10, 1978

Dr. Frank Craighead
P. O. Box 156
Mooth, Wyoming 83012

Re: Melvin B. Ford

Dear Dr. Craighead:

I appreciate your recent letter to my office. I was sorry to hear of the fire and I can surely understand the problems that that would create.

I had the opportunity to speak with your brother and he told me of the problems that the two of you have had with the park service. He said he was somewhat reluctant at this time to become involved with the Melvin Ford case. He did state, however, he would be happy to discuss this case with me.

I have gone over the Walker case rather carefully with the attorneys involved in their office in California. I have also read the appeals and the various decisions on the part of the federal circuit court when they reversed the district court. I think our factual situation is somewhat different than the Walker case. We would have issues involving negligence that were not available in the Walker case. From my investigation so far, it would show that the park service is very inept in their management of the grizzly bears in Yellowstone Park.

If you cannot become involved to the extent of testifying in this case, I can understand that. I would appreciate meeting with you though, and reviewing some of the facts that I have been able to uncover. My client would be willing to pay for your usual fee. Your wife mentioned that you had a son or daughter attending Utah State University and you are occasionally in Logan. I have relatives in Cacue Valley and I am quite frequently in that area. Perhaps it would be convenient if we could meet in Logan. If that is not convenient,

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I would be happy to drive to your home in Wyoming and meet with you at your convenience. If you could let me know whenever this is convenient, I would be happy to make arrangements that would meet your schedule.

Any help that you could provide to us would be appreciated.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:plb

cc: Melvin Ford

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AREA CODE 801
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P. O. BOX 778

November 9, 1977

OUR FILE NO.

Enviornmental Research Institute
Frank C. Craighead, Jr.
P. O. Box 156
Moose, Wyoming 83012

Dear Mr. Craighead:

We appreciated receiving the information that you sent us. We are returning the Grizzly Bear - Man Relationships in Yellowstone National Park that you asked for.

Thank you very much for your help. We will be in contact with you in the future.

Sincerely,

HOWARD, LEWIS & PETERSEN

Lynn P. Tilby

Lynn P. Tilby
Investigator

LPT/mp

Enclosures

April 27, 1978

Don R. Petersen
Howard, Lewis and Petersen, Attorneys and Counselors at Law
Delphi Building
120 E. 300 N. St.
Provo, Utah 84601

Dear Mr. Petersen:

There is a possibility that I may be coming to Logan, Utah within the next month or so and should this be the case I will get in touch with you in advance.

I would be glad to meet with you as you suggested and review some of the facts that you have been able to uncover in the case of your client. I could also discuss the situation existing at that time in Yellowstone regarding the grizzly bears.

I previously gave you the name of a young man, Jack Kirkley, who is attending Utah State University at Logan. He was working in Yellowstone at the time of the mauling and is familiar with conditions existing in the campgrounds and surrounding areas. If you haven't contacted him you might wish to do so. If you are coming this way in the near future I would be glad to meet with you in this area. My usual fee for this type of consulting is $40 per hour.

Sincerely,

Frank Craighead

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OUR FILE NO.

November 3, 1978

Dr. Frank Craighead
Box 156
Moose, Wyoming 83012

Re: Melvin Ford

Dear Dr. Craighead:

I appreciate your recent letter to our office. I apologize for omitting the check that should have been enclosed before. Enclosed is a $150.00 check that should have been enclosed in our prior letter.

I will be getting back in touch with you. I might add that the trial date has been continued until September of next year. This will give us a little more time to get prepared for the case.

Very truly yours,

HOWARD, LEWIS & PETERSEN

Don R. Petersen

DRP:plb

Enclosure

HOWARD, LEWIS & PETERSEN
ATTORNEYS AND COUNSELORS AT LAW
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OUR FILE NO.

May 26, 1981

Dr. Frank C. Craighead
Box 156
Moose, Wyoming 83012

RE: Ford v. U.S.A.

Dear Dr. Craighead:

Enclosed is a check for $440.00 to pay for your expenses to date.

We are in the process of negotiating with the government. I thought there was a possibility of settling the case but as time marches on, it appears that we will not be able to settle the case. The matter is now set for trial on November 16, 1981. It appears that we will need to gear up and get ready for that trial date. We would expect to call you the 17th or 18th, if that would work into your schedule.

Your help is greatly appreciated.

Very truly yours,

HOWARD, LEWIS & PETERSEN

DON R. PETERSEN

DRP/dp
Enclosure