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March 1, 1985

MEMORANDUM FOR POTENTIAL WITNESSES IN MDMA PROCEEDING

FROM: Richard Cotton

As most of you know, this firm represents Dr. George Greer, Dr. Lester Grinspoon, Professor James Bakalar, and Professor Thomas Roberts in the Drug Enforcement Agency ("DEA") hearing on the scheduling of MDMA. I have talked with most of you (and I have attempted to reach the rest) about the possibility of each of you appearing as a witness in the DEA proceeding.

The primary issues in this proceeding are the following:

(1) Does MDMA have a potential for abuse? If so, is that potential high, moderate or low? And on a related question, does MDMA have a dependence-causing potential?

(2) Can MDMA be safely used under a physician's supervision?

(3) Does MDMA have a currently accepted medical use in the United States? If MDMA does not have an accepted medical use, do we know enough to say that MDMA at least has significant therapeutic potential which deserves further research?

We have now been asked by the Administrative Law Judge conducting these proceedings to submit a proposed list of witnesses who will appear on behalf of Drs. Greer and Grinspoon and Professors Bakalar and Roberts. We must also submit a very brief summary of the nature of the testimony -- that is the general subject matter it will cover and the general perspective it will express. Therefore, I now need a firm commitment from each of you as to whether you are prepared to appear as a witness in these proceedings and a short statement describing the nature of your

proposed testimony. The statements should be no longer than one page and could even be briefer -- for example, three general points or areas that you intend to discuss with an indication of your general conclusion with respect to each point.

I will need to have these statements in hand by March 8, 1985. I will call each of you during the week of March 4, 1985. If you can put these statements in the mail to me, that would be the easiest.

Thank you for your assistance and cooperation in this matter.

A handwritten signature in cursive script that reads "R. Cotton". The signature is written in dark ink and is positioned above the printed name.

Richard Cotton

LIST OF POTENTIAL WITNESSES

Jack Downing, M.D.

George Greer, M.D.

Lester Grinspoon, M.D.

Rodney Houghton, M.D.

Richard Ingrasci, M.D.

David E. Nichols, Ph.D.

June Reidlinger, R.Ph.

Thomas B. Roberts, Ph.D.

Richard Seymour

Lance Wright, M.D.

Richard Yesen, M.D.

Norman Zinberg, M.D.