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11-6-1987

**Civil Action No. 84-3040 Plaintiff's Request for Production of Documents Relief Phase - Set I**

United States District Court for the District of Columbia

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11/6/87


UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ANN B. HOPKINS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 84-3040
	)	(Gesell, J.)
PRICE WATERHOUSE	)	
Defendant.	)	

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
RELIEF PHASE - SET I

1. Produce originals or true copies of all documents which contain the information requested in Interrogatories Nos. 2(b), 3(b), 4(b), and 6(c) and (d).

  
James H. Heller, D.C. Bar 079350

  
Douglas B. Huron, D.C. Bar 089326  
KATOR, SCOTT & HELLER  
1029 Vermont Avenue, N.W. #900  
Washington, D.C. 20005  
202/393-3800

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 1987, I mailed, first class postage prepaid, a copy of the foregoing document to Theodore B. Olson, attorney for defendant, 1050 Connecticut Avenue, N.W., Washington, D.C. 20036.

  
James H. Heller

11/6/87

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ANN B. HOPKINS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 84-3040
	)	(Gesell, J.)
PRICE WATERHOUSE	)	
	)	
Defendant.	)	

PLAINTIFF'S INTERROGATORIES  
RELIEF PHASE - SET I \*

1. Provide the partnership earnings received in each year since 1983 of each person made a partner in Price Waterhouse in the year 1983.

2. (a) Provide a description of the nature and amount of all tangible benefits, other than partnership earnings, received, in each year since 1983, by each person made a partner in Price Waterhouse in 1983, including:

- Group health insurance
- Group life insurance
- Any other kinds of insurance
- Thrift or savings plan contributions
- Vested pension or profit sharing or other retirement plan contributions
- Deferred compensation

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\* / Plaintiff agrees that in answering Interrogatories 1, 2(a), 3(a), and 4 defendant may use a consistent numbering or other coding system in lieu of names of individual partners. However, plaintiff reserves the right to request production of the underlying documents.

- §401(k) matching contributions
- Any other tangible cash or non-cash benefits

(b) Describe the formulas by which such benefits were calculated and will be calculated in the future. Also state the amount of each kind of insurance and its cost per partner to Price Waterhouse.

3. (a) Provide the value for each year since 1983 of the partnership equity of each person made a partner in Price Waterhouse in 1983.

(b) Describe the formula(s) by which partnership equities have been determined since 1983 and will be determined in the future.

4. Provide the amounts for each year since 1983 of federal, state, and local income tax credits or deductions (such as investment tax credits, job credit, depreciation or cost recovery allowances, capital loss carry forwards, etc.) passed through to each person made a partner in Price Waterhouse in 1983.

5. Provide the following information for each calendar year since 1967:

(a) The average total cash value per Price Waterhouse partner of all (i) partnership earnings, plus (ii) other tangible partner benefits (excluding passed-through income tax benefits), plus (iii) additions to partner equity.

(b) The same information for an average partner with 5, 10, 15, 20, 25 years of partnership status.


6. (a) Is defendant willing to make plaintiff a partner in Price Waterhouse if the Court of Appeals' judgment in this case stands?

(b) If so, on what terms?

(c) If not, how does defendant believe the Court should calculate "front earnings" or future relief for plaintiff in lieu of partnership?

(d) Using the method described in answer to (c), calculate (i) the present cash value of a single lump sum payment to plaintiff for future relief, and alternatively (ii) the amount of equal monthly payments to provide plaintiff with an annuity of equal value. Explain your calculations and cite any published texts, tables, or formulas used in those calculations.

  
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