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**Civil Action No. 84-3040 Plaintiff's Response to Defendant's
Request for Documents**

United States District Court for the District of Columbia

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11/14/89

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 RESPONSE TO DEFENDANT'S
REQUEST FOR DOCUMENTS**

Plaintiff responds to defendants Request for Documents as follows:

Request No. 1. Your income tax returns (federal/state) for the years 1983 through 1988 (as well as any W-2's, K-1's, or 1099 forms for those years). [Defendant is prepared to execute a protective order to protect the confidentiality of these documents.]

Response: Accompanying this response are copies of plaintiff's federal and District of Columbia income tax returns for 1983-1988. Plaintiff does not request a protective order. Otherwise, the response to Request No. 2 also applies to this request.

Request No. 2. All documents that evidence or relate to your efforts to find employment or work (including work performed on a consulting or independent contractor basis) since 1982. [These documents include, but are not limited to: applications, offer letters, bids or proposals, letters inquiring about possible work, resumes, rejection letters, letters offering your services.]

Response: All such files and documents that plaintiff has are in the offices of plaintiff's attorneys and may be inspected and designated by defendant's attorneys for copying by plaintiff's attorneys at any mutually convenient time henceforth. The files and

documents are too voluminous and cumbersome for production at a deposition outside the offices of plaintiff's attorney.

Request No. 3. All documents that concern your efforts to enter into a partnership or any other business relationship (including "principal" status) since 1982 (excluding Price Waterhouse).

Response: Same response as to Request No. 2.

Request No. 4. All documents that evidence compensation or income in any form that you have received for work or services performed by you since leaving Price Waterhouse.

Response: Same response as to Request No. 2.

Request No. 5. All documents that concern your contacts with recruiters or executive search firms or any type of employee placement organization since 1982.

Response: Same response as to Request No. 2.

Request No. 6. All documents that concern any business that you have operated since leaving Price Waterhouse.

Response: Same response as to Request No. 2.

Request No. 7. All documents that evidence the hours that you have worked as an employee, independent contractor, consultant, principal, partner, or owner of a business since you left Price Waterhouse.

Response: Same response as to Request No. 2.

Request No. 8. All documents that reflect any employee benefits or benefit plans that you have been provided or been covered by since you left Price Waterhouse.

Response: Same response as to Request No. 2.

Request No. 9. All documents that concern any business or investment that you have actively managed since leaving Price Waterhouse.

Response: Same response as to Request No. 2.

Request No. 10. Any documents praising, criticizing, evaluating or otherwise commenting on work you have performed since leaving Price Waterhouse.

Response: Same response as to Request No. 2.

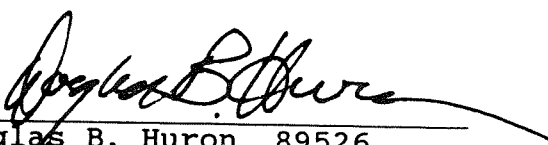
Request No. 11. All proposals, bids, or offers to supply services to any federal or state agency which you have worked on since leaving Price Waterhouse.

Response: Same response as to Request No. 2.

Request No. 12. All documents that concern any claims for unemployment compensation you have made since leaving Price Waterhouse.

Response: Inapplicable.

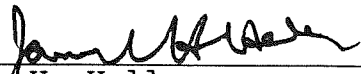

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Attorneys for Plaintiff

Certificate of Service

I hereby certify that a copy of the foregoing document together with copies of the tax returns referred to in the Response to Request No. 1 were delivered to the office of Theodore B. Olson, Gibson, Dunn & Crutcher, 1050 Connecticut Avenue, N.W., Washington, D.C. 20036 on November 14, 1989.



James H. Heller