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No. 84-3040 Amended Notice of Depositions and Request for Documents

United States District Court for the District of Columbia

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EXHIBIT
1/12/90

Civil Action No. 84-3040
(Gesell, J.)

(a) The nomination for and/or election to partnership in Price Waterhouse during the last 15 years of any person who was

previously nominated for, but not elected to, partnership in another major * accounting or management consulting firm, specifically including (but not limited to) the age of each such person at the relevant times.


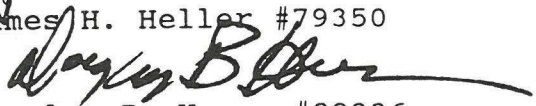
(b) The nomination for and/or election to partnership in another major * accounting or management consulting firm of any person who was previously nominated for, but not elected to, partnership in Price Waterhouse, specifically including (but not limited to) the age of each such person at the relevant times.

(c) Price Waterhouse's policy and practice during the period since 1983 concerning the geographic reassignment or relocation of partners between offices of the firm located in different metropolitan areas, including any policy or practice of requiring such reassignments or relocations against the wishes of the partner(s) in question.

(d) Instances during the last 15 years in which a partner of Price Waterhouse has been subjected to mandatory withdrawal from the firm or has been forced to accept early retirement for reasons other than physical or mental disability.

* "Major" means, for these purposes, 50 or more partners at the time in question.

(e) Any other documents which defendant intends to offer as exhibits at the trial of remedy/relief issues in connection with the testimony of Mr. Connor or Mr. Redford.


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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on defendant by delivering a copy to the office of Wayne A. Schrader, Attorney for Defendant, 9th floor, 1059 Connecticut Avenue, N.W., Washington, D.C. on January 3, 1990.


James H. Heller