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**Civil Action No. 84-3040 Plaintiff's Discovery Requests Relief
Phase - Set I (Revised)**

United States District Court for the District of Columbia

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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 DISCOVERY REQUESTS
RELIEF PHASE - SET I (Revised)*

These discovery requests supersede the interrogatories served on defendant in November 1987. As used in these requests, the term "partner" and its variants includes "principal" and its variants. The phrase "each year since 1983" as used in interrogatories 1(a), 2(a), 3(a) and 4(a) includes the last six months of 1983 and the first nine months of 1989.

A. Interrogatories

1. (a) Provide the partner income received in each calendar year since 1983 by each person made a partner in Price Waterhouse in the year 1983. For each such person, indicate whether he is a Tax, Audit, Management Consulting or "Other" partner and indicate the Price Waterhouse office(s) in which the person has worked since being made partner, with the inclusive periods for each such office if more than one office is involved.

* Plaintiff agrees that in answering Interrogatories 1(a), 2(a), 3(a), and 4(a) 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.

If defendant believes a particular person received abnormally high or low partner income for all or any part of a year, please indicate and explain the reasons why that happened.

(b) Describe the formula(s) by which partnership income or income units have been allocated to individual Price Waterhouse partners since 1983. Also state the annual changes since 1983 in the value of units if they are used to determine partner income.

2. (a) Provide a description of the nature, amount and cost to Price Waterhouse of all tangible benefits paid for by Price Waterhouse, other than partnership earnings, received in each year since 1983 by each person made a partner in Price Waterhouse in 1983, including, but not necessarily limited to:

- 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
- § 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.

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

(b) Describe the formula(s) by which partnership equities or interests in assets have been determined since 1983 and will be determined in the future, including any contribution or payment the partner is required to make and any provision made by Price Waterhouse for financing such payments.

4. (a) 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.

(b) Describe the formulas used in calculating such pass-throughs.

5. Provide the following information for each calendar year since 1967 and for the first nine months of 1989:

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), paid for by Price Waterhouse, plus (iii) additions to partner equity.

6. (a) With reference to Part VI of "Defendant's Memorandum on Issues for Remedial Phase Trial" (served Feb. 1, 1988), how does defendant believe the Court should calculate "front earnings" or future relief for plaintiff in lieu of making plaintiff a partner, assuming she prevails on liability?

(b) Explain why defendant believes its answer to (a) is a fair formula for calculating "front earnings." Cite any

published texts, tables, formulas, decisions, or other authority relied on for that belief.


7. Identify each witness defendant intends to call at the relief stage of this case and the expected subject matter of that person's testimony. (Note that this is not a request for Rule 26(b)(4) information at this point.)

B. Document Request

1. Produce true copies of all internal Price Waterhouse documents used in answering Interrogatories 1(b), 2(b), 3(b), and 4(b).

2. Produce true copies of all revisions of or amendments to the "Price Waterhouse & Co. (United States Firm)" partnership agreement since July 1, 1979.

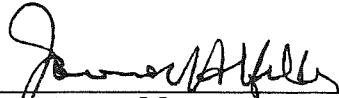

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Certificate of Service

I hereby certify that on October 5, 1989, a copy of the foregoing document was delivered to the office of Theodore B. Olson, attorney for defendant, 1050 Connecticut Avenue, N.W., Washington, D.C. 20036.



James H. Heller