

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HAMILTON SECURITIES ADVISORY SERVICES, INC.)	
)	
Plaintiff,)	CASE NO. 97-169C
)	
v.)	(JUDGE HORN)
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS**

Plaintiff, Hamilton Securities Advisory Services, Inc. ("Hamilton"), responds to Defendant's Second Request for Production of Documents as follows:

GENERAL OBJECTIONS

Hamilton asserts the following objections as to all of Defendant's requests, and it does not waive any of these objections in producing documents responsive to Defendant's requests.

1. Hamilton objects to Defendant's Second Request for Production of Documents to the extent that it seeks documents subject to the attorney client communication or attorney work product privileges.

2. Hamilton objects to Defendant's Second Request for Production of Documents to the extent that it purports to place requirements on Hamilton in excess of those provided for under the Rules of the Court of Federal Claims.

3. Hamilton objects to Defendant's Second Request for Production of Documents to the extent that it requests production of documents not within Hamilton's possession, custody or control.

4. Hamilton objects to Defendant's Second Request for Production of Documents on the bases that it is duplicative of Defendant's First Request for Production of Documents and that it is unduly burdensome and expensive.

REQUESTS AND RESPONSES

1. **All documents that you were requested to identify in Defendant's First Set of Interrogatories.**

RESPONSE:

Hamilton will produce non-privileged responsive documents for inspection and copying at a time mutually convenient for counsel at the offices of Hamilton's counsel or at the Special Master's office.

Respectfully submitted,

Dated

Claude P. Goddard, Jr.
Wickwire Gavin, P.C.
International Gateway, Suite 700
8100 Boone Blvd.

Vienna, VA 22182-7732
Telephone: (703) 790-8750
Fax: (703) 448-1767
Attorney for Plaintiff

OF COUNSEL:
Michael McManus
Drinker, Biddle & Reath, LLP
1500 K Street, N.W.
Suite 1100
Washington, DC 20005
Telephone: (202) 842-8830
Fax: (202) 842-8465

Certificate of Service

The undersigned certifies that he caused a copy of the foregoing Plaintiff's Response to Defendant's Second Request for Production of Documents to be served on the following government counsel by fax and first class mail on September 21, 1999:

David J. Gottesman
Attorney
Commercial Litigation Branch
Civil Division
United States Department of Justice
Washington, D.C. 20005

Attn: Classification Unit
8th Floor, L Street Building

Claude P. Goddard, Jr.