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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

April 12, 1984

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FILE NO. 24566.3

DIRECT DIAL NO. 804 788

BY TELECOPIER

Lawrence Coe Lanpher, Esq.  
Kirkpatrick, Lockhart, Hill,  
Christopher & Phillips  
1900 M Street, N.W.  
Washington, D.C. 20036

50-322-OL-4  
(Low Power)

Dear Larry:

This will confirm our telephone conversation at 4:45 p.m. today in which you advised us that the County has not yet retained any experts and will not identify or produce for deposition any witnesses before the close of discovery on April 16, 1984.

This will further confirm that Doug Scheidt and two paralegals will be at Shoreham tomorrow at 12:00 noon to review the documents LILCO is producing in response to the discovery request which we received at approximately 10:15 a.m. this morning. You should know that in an effort to accommodate the County, we have requested that LILCO personnel work on the document requests this evening and we have taken steps to have the documents from GE in California delivered to New York for your inspection tomorrow. We understand it is your intention to review these documents tomorrow afternoon, but that you will not be present to review documents on Saturday or Sunday, though we have offered to make the documents available around the clock throughout the weekend and until the close of discovery.

In the course of our telephone conversation less than two hours ago, you also indicated you might have some additional document requests in the future. We assumed that you meant that after you reviewed the many documents we are

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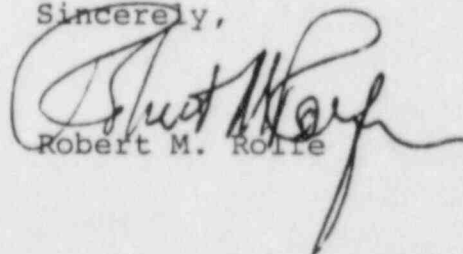
HUNTON & WILLIAMS

Lawrence Coe Lanpher, Esq.  
April 12, 1984  
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already producing that you might have additional requests. We were quite surprised, therefore, to receive another extensive document request from you no more than one hour after we concluded our telephone conversation. This request certainly must have been in existence at the time that we had our telephone conversation. I am shocked and disappointed that you did not then mention these new requests. You apparently disregard the Board's direction that the parties cooperate in discovery. We have gone to extreme lengths to produce in approximately 24 hours the voluminous documents you requested this morning and are making every effort to afford you ample opportunity for discovery even in view of your belated requests. Your second request has all the earmarks of being no more than a reaction to our favorable response to your first request -- merely an effort to find the limit at which we are unable to respond.

Despite this, we will make an effort to review and produce documents responsive to your second request except, of course, with respect to requests that might be objectionable. You should expect our response as to when documents will be available for your review sometime tomorrow.

Sincerely,



Robert M. Rolfe

RMR/403

cc: Judge Marhsall E. Miller  
Judge Glenn O. Bright  
Judge Elizabeth B. Johnson  
All Parties