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VIA EXPRESS MAIL

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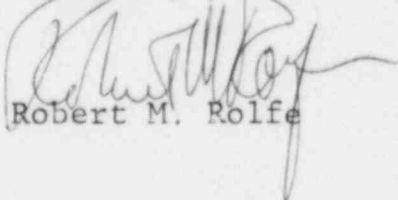
Ira M. Millstein, Esq.
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Weil, Cotshal & Manges
767 Fifth Avenue
New York, New York 10153

Long Island Lighting Company
v. Transamerica Delaval, Inc.
Civil Action No. 85 CIV 6892(GLG)

Gentlemen:

With this letter, LILCO is serving LILCO's
Second Set of Interrogatories and Request for Production of
Documents to Transamerica Delaval, Inc.

Sincerely yours,



Robert M. Rolfe

177/6071

Enclosure

bc: Mr. Ralph Caruso

Laurence V. Senn, Jr., Esq.

Anthony F. Earley, Jr., Esq.

Mr. Joseph M. Kelly

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PDR ADDCK 05000322
PDR
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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X	
LONG ISLAND LIGHTING COMPANY,	:
a New York Public Service	:
corporation,	:
	:
Plaintiff,	:
	:
-against-	:
	:
TRANSAMERICA DELAVAL, INC.,	:
a Delaware corporation,	:
	:
Defendant.	:
-----X	

Civil Action No.
85 CIV 6892 (GLG)

LILCO'S SECOND SET OF
INTERROGATORIES AND
REQUEST FOR PRODUCTION
OF DOCUMENTS TO
TRANSAMERICA DELAVAL, INC.

Long Island Lighting Company (LILCO), by counsel,
pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil
Procedure propounds to Transamerica Delaval, Inc. (TDI) the
following interrogatories and request for production of
documents.

Definitions

The definitions contained in LILCO'S First Set of
Interrogatories and Request for Production of Documents to
Transamerica Delaval, Inc., served in this action are expressly
incorporated herein and shall apply throughout this Second Set
of Interrogatories and Request for Production of Documents.

Interrogatories

1. Describe all documents otherwise responsive to LILCO'S First Request for Production of Documents or Second Request for Production of Documents which have been destroyed by or are no longer retained by TDI. As to all such documents, identify each and every person responsible for the retention and later destruction or other disposal of such documents.

2. Identify every engineer and all other people employed by TDI or retained by TDI as a consultant and having involvement in the development of TDI's R5 engine.

Request for Production of Documents

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, LILCO requests that TDI produce the following documents for copying and inspection at a time and place upon which the parties mutually agree, but in no event in excess of 30 days after TDI serves its response to this Request

1. All files, personal or otherwise, maintained between January 1, 1974 and the present by or containing information about any or all of the following:

- (a) Warren Rhoades,
- (b) Frank Smallon,
- (c) Dick Desmeraux,

- (d) Ed Deane,
- (e) Dan Cady,
- (f) Bob Wister,
- (g) Al Nance,
- (h) Stanley Learn,
- (i) William Borza, and
- (j) the predecessor of Roland Yang.

2. TDI Research Document HE-01-1979 entitled, "A Flow-Bench Study of the R5 Cylinder Head," by D. Reid.

3. TDI Research Document MI-02-1980 entitled, "Dynamic Stress Determination in Critical R5 Fasteners," by D. Reid.

4. TDI Research Document CY-01-1984 entitled, "R-46 Upper Cylinder Block Dynamic Strain Gage Test," by G. Beshouri et al.

5. TDI Research Documents PI-02-1982 and PI-03-1982, entitled "Thermal Stress Characteristics of the R5 Piston Crown, Part I and II," by D. Reid.

6. TDI Research Document PI-04-1982, entitled "Stress Determination in the R5 Piston Crown and Skirt Using Simulated Thermal and Mechanical Loading," by H. Schilling.

7. TDI Research Document RO-01-1982, entitled "Experimental Stress Analysis of the R5-V12 Connecting Rod at Full Engine Rating," by D. Reid.
8. TDI Research Document R0-01-1983, entitled "Dynamic Strain Gage Testing of the R5-V12 Connecting Rod and Box Assembly," by D. Reid.
9. TDI Applied Mechanics Document, dated July 1979, entitled "Bearing Load Analysis for R5 Inline and Vee Engines," by D. Beck and T. White, et al.
10. TDI Research Document FR-01-1980, entitled "Dynamic Strain Gage Testing of the Vee-Engine Crankcase, R4 and R5 Series," by B. Gurry.
11. TDI Research Document FR-01-1982, entitled "Actual Stress Determination of the R5 Engine Base," by D. Reid.
12. TDI Research Document FR-02-1980, entitled "Fillet Bolting Stressss at the Main Bearing Keys of the R5-V12 Engine," by D. Reid.
13. TDI Research Document EM-01-1981, entitled "Application for Authority to Construct and Permit to Operate Transamerica Delaval's R5-V12 Research Engine," by R. Kaiser, et al.

14. TDI Research Document EN-01-1983, entitled "Standard Heat Balances for the R4 and R5 Series Engines Operating in the Diesel Mode," by A. Gillette.

15. TDI Research Document TU-02-1982, entitled "Performance Testing of a High-Pressure C17 Turbocharger Containing a Forges Aluminum Compressor Wheel," by A. Gillette.

16. All TDI research documents generated between 1970 and 1985 concerning any component of the R4 engines or the entire R4 engines.

17. All files containing notes, records or any other documents discussing, pertaining to, used in the writing of, or relating to any of the research documents described above in requests 2 through 16.

18. All documents discussing, generated as a result of, pertaining to or relating to TDI's development of the R5 series engine.

19. All minutes, notes or other documents discussing, pertaining to or generated during or as a result of TDI's weekly product quality meetings or delivered product quality meetings held at any time since 1970.

20. All documents pertaining to, discussing, reflecting or generated as a result of TDI's decision to ship the Shoreham EDGs despite the concern or suggestion of any TDI employee that one or more components of the Shoreham EDGs were not fit for their intended use.

21. All documents authored by any employee of TDI discussing all or any of the following:

- (a) the development of the R-4 engine,
- (b) tests or calculations performed incident to the development of the R-4 engine, or
- (c) features that made the R-4 engines different from their predecessor R-3 engines.

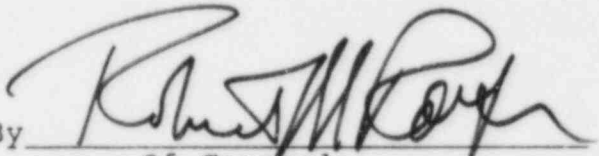
22. All TDI research documents with any of the following prefixes generated at any time between 1965 and 1985:

- (a) PI,
- (b) HE,
- (c) MI,
- (d) CY,
- (e) RO,
- (f) FR,
- (g) EM,

(h) EN, and

(i) TU.

LONG ISLAND LIGHTING COMPANY

By 
Of Counsel

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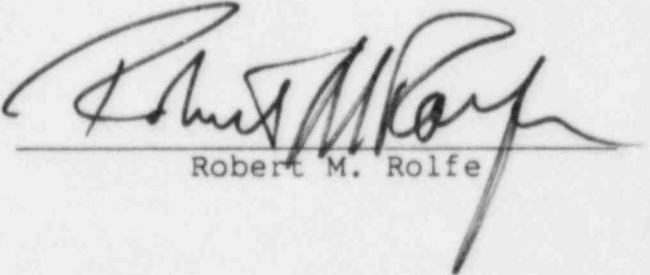
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Counsel

AFFIDAVIT OF SERVICE

I hereby certify that on this 7th day of November, 1985, a true copy of the foregoing LILCO'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO TRANSAMERICA DELAVAL, INC. was served by Express Mail to Robert E. Smith, Esq., Rosenman, Colin, Freund, Lewis & Cohen, 575 Madison Avenue, New York, New York 10022 and to Ira M. Millstein, Esq. and James W. Quinn, Esq., Weil, Gotshal & Manges, 767 Fifth Avenue, New York, New York 10153.



Robert M. Rolfe