

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DONALD G. GROSS,

Plaintiff,

V.

AKIN GUMP STRAUSS HAUER & FELD
LLP,

Defendant.

Case No. 1:07CV00399 (ES)

**DEFENDANT’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S SECOND SET OF INTERROGATORIES**

Defendant Akin Gump Strauss Hauer & Feld LLP (“Akin Gump”), by counsel and pursuant to Federal Rule of Civil Procedure 33, hereby submits its objections and responses to Plaintiff Donald G. Gross’s Second Set of Interrogatories.

1. GENERAL OBJECTIONS

In addition to the objections specifically asserted below, Akin Gump asserts the following general objections, which are applicable to all of the interrogatories:

A. By producing documents or supplying other information responsive to these interrogatories, Akin Gump does not concede, and reserves all objections with respect to the relevance, materiality or admissibility of such documents or information.

B. Akin Gump objects to these interrogatories to the extent that they purport to require the disclosure of communications, documents or information prepared in anticipation of litigation or protected by the work product doctrine or subject to a claim of privilege, including,

without limitation, the attorney-client privilege. Akin Gump hereby claims such privileges and protections to the extent implicated by these interrogatories and excludes privileged and protected information from its responses to these interrogatories. Any disclosure of such protected or privileged information is inadvertent and is not intended to waive those privileges and protections.

C. Akin Gump objects to these interrogatories to the extent that they purport to require the disclosure of information protected by its clients' attorney-client privilege and/or its clients' information protected by the work product doctrine. Akin Gump hereby claims such privileges and protections to the extent implicated by these interrogatories and excludes privileged and protected information from its responses to these interrogatories. Any disclosure of such protected or privileged information is inadvertent and is not intended to waive those privileges and protections.

D. Akin Gump objects to the interrogatories to the extent that they purport to impose on Akin Gump obligations beyond those imposed by the Federal Rules of Civil Procedure.

E. Akin Gump objects to the instruction that "the term 'identify' or 'identity' when used in conjunction with a person means to state the person's . . . (2) last known residence and business address, (3) last known home and business telephone numbers. . . ,," because all of the individuals identified herein are current or former members of Akin Gump. All individuals mentioned herein can be contacted through undersigned Defendant's counsel.

2. SPECIFIC OBJECTIONS

Akin Gump specifically incorporates all of the aforementioned general objections into the following specific objections.

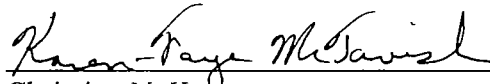
INTERROGATORIES

INTERROGATORY No. 1: *For each document produced in response to Plaintiff's Requests for Production of documents, please identify by bates number the discovery request(s) to which each document corresponds.*

RESPONSE: Defendant objects to this request as overbroad and unduly burdensome and because it imposes obligations beyond those imposed by the Federal Rules of Civil Procedure.

DATED: July 12, 2007

Respectfully submitted,



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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of July, 2007, a copy of the foregoing Defendant's Objections and Responses to Plaintiff's Second Set of Interrogatories was served via facsimile on the following counsel of record (with Hand Delivery to follow on July 13, 2007):

Jonathan C. Puth
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Karen-Faye McTavish