

10-1-81

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	77-C-1881 FXA
	)	
Nassau County, et al.,	)	
	)	
Defendants.	)	

SECOND SET OF INTERROGATORIES OF PLAINTIFF UNITED
STATES TO THE NASSAU COUNTY DEFENDANTS

Pursuant to Rule 33, F.R. Civ. P., plaintiff United States requests defendants Nassau County, Samuel Rozzi, Commissioner, Nassau County Police Department, Gabriel S. Kohn, Edward S. Witanowski and Edward Simmons, Commissioners, and the Nassau County Civil Service Commission (hereinafter collectively referred to variously as the "Nassau County defendants," "Nassau County" or the "County") to answer the following interrogatories within thirty (30) days after the date upon which they are served.

These interrogatories shall be deemed to be continuing and any information secured by any of the Nassau County defendants subsequent to the filing of its answers hereto, which would have been included in its answers had such information been known, should be provided to the United States by supplemental answer.

It is requested that the Nassau County defendants restate each interrogatory in full before the answer to it. If the answer to any interrogatory incorporates or refers to the answer to any other interrogatory, the pertinent information incorporated or referred to should be clearly specified.

INTERROGATORY NO. 1

Set forth the full name and business address of each person whom the Nassau County defendants expect to call as an expert witness at the trial of this action, the subject matter with respect to which such person is expected to testify, the opinions with respect to which such person is expected to testify and a summary of the grounds for each such opinion.

INTERROGATORY NO. 2

For each person identified in answer to Interrogatory No. 1, supra:

a. Set forth such person's educational and professional or work background, specifying:

- (1) Each college and post-college degree received, the field of learning in which received, the date received, and the name and location of the bestowing school;
- (2) The full name and address of each agency, organization, government, company, corporation or other entity for which the person

has performed work; the dates during which the person performed work for each such entity; a detailed description of the nature of the work which was performed by the person for each such entity; whether such person performed such work while an employee, a private consultant or an independent contractor; and the title or description of each position held by the person while employed by such entity, and the dates during which the person held each such position;

b. Set forth the title, subject matter, name and address of the publisher and date of publication of each writing of such person which has been published;

c. Set forth the title, subject matter and date of completion of each writing of such person which has not been published; and

d. Set forth the caption, number and location of filing of each case in which such person has testified, either by affidavit or deposition or in person and the name of the party on whose behalf such testimony was given.

INTERROGATORY NO. 3

Set forth the name of each individual whom the Nassau County defendants expect to call as a witness at the trial of this action, and the subject matter with respect to which such person is expected to testify.

INTERROGATORY NO. 4

For each person identified in answer to Interrogatory No. 3, supra:

a. Set forth such person's complete home address or, if not known, last known complete home address;

b. Present employer, complete business address and telephone number, job title (or rank, if a sworn officer) in which employed, and duties and responsibilities in that job; or if present employer not known, last known employer, complete business address and telephone number, job title or rank in which employed, and duties and responsibilities in that job or rank; and

c. Business profession and/or occupation, if that person is self-employed, as well as that person's complete business address and telephone number and the name of that person's company, firm or business.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Roger A. Colaizzi", is written over a horizontal line.

JOHN M. GADZICHOWSKI
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States

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UNITED STATES OF AMERICA,	)	
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Plaintiff,	)	
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v.	)	Civil Action No.
	)	77-C-1881 FXA
	)	
Nassau County, et al.,	)	
	)	
Defendants.	)	
_____	)	

SECOND REQUEST OF PLAINTIFF UNITED STATES FOR THE
PRODUCTION OF DOCUMENTS BY THE NASSAU COUNTY DEFENDANTS

Pursuant to Rule 34, F. R.Civ. P., plaintiff United States requests defendants Nassau County, Samuel Rozzi, Commissioner, Nassau County Police Department, Gabriel S. Kohn, Edward S. Witanowski and Edward A. Simmons, Commissioners, and the Nassau County Civil Service Commission (hereinafter collectively referred to variously as the "Nassau County defendants," "Nassau County" or the "County") to produce the following documents within thirty (30) days after the date upon which this Request is served.

It is requested that each of the documents produced by the Nassau County defendants in response hereto be organized and labeled to correspond to the particular Request and subsection thereof requesting its production.

b. "Identify" or "identity" when used with respect to a document means:

- (1) The type of document (e.g., report, study, analysis, memorandum, letter, minutes, microfilm, punch card, recording used in data processing, tape recording used in data processing, tape recording in machine-readable form, etc.);
- (2) Its date and place of origin, identities of author(s) and addressee(s), date of communication or delivery, its present location of custody, and full name and complete address of its custodian; and
- (3) If such document has been published, its title, author, date and place of publication, name of publisher and Library of Congress number.

REQUEST NUMBER 1

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

- a. The subject matter with respect to which each person whom the Nassau County defendants expect to call as an expert witness at the trial of this action is expected to testify; and
- b. The opinions with respect to which each person is expected to testify and grounds for each opinion of such person.

REQUEST NUMBER 2

For each person whom the Nassau County defendants expect to call as an expert witness at the trial of this action, each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to:

a. Such person's educational and professional or work background (e.g., curriculum vitae), detailing:

- (1) Each college and post-college degree received, the field of learning in which received, the date received, and the name and location of the bestowing school;
- (2) The full name and address of each agency, organization, government, company, corporation or other entity for which the person has performed work; the dates during which the person performed work for each such entity; a detailed description of the nature of the work which was performed by the person for each such entity; whether such person performed such work while an employee, a private consultant or an independent contractor; and the title or description of each position held by the person while employed by such entity, and the dates during which the person held each such position;

b. The title, subject matter, name and address of publisher and date of publication of each writing of such person which has been published;

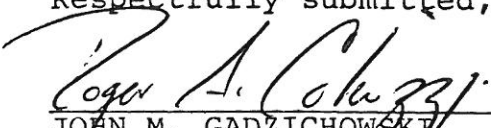
c. The title, subject matter and date of completion of each writing of such person which has not been published; and

d. The caption, number and location of filing of each case in which such person has testified, either by affidavit or deposition or in person and the name of the party on whose behalf such testimony was given.

REQUEST NUMBER 3

Each document which sets forth, reflects, describes, discusses, comments upon or in any way pertains to the subject matter with respect to which each individual whom the Nassau County defendants expect to call as a witness at the trial of this action will testify.

Respectfully submitted,


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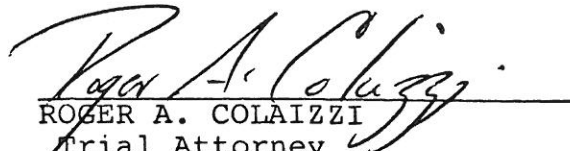
CERTIFICATE OF SERVICE

I, ROGER A. COLAIZZI, hereby certify that on the 2nd day of October 1984, I served copies of the foregoing Second Set of Interrogatories and Second Request of Plaintiff United States for the Production of Documents by the Nassau County defendants by Federal Express upon each of the following counsel of record:

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