

BY OVERNIGHT MAIL

July 2, 2001

The Honorable Jerry M. Hermele
Administrative Law Judge
National Labor Relations Board
1099 14th Street, N.W.
Washington, DC 20570

Subject: In the matter of Pal Consultants, Inc., and Nick Pal,
Docket No. 01-01-PF

Dear Judge Hermele:

Enclosed please find a copy of the NRC Reviewing Official's interrogatories, request for admissions, and request for production of documents addressed to Respondents in the above-named matter, Nick Pal and Pal Consultants, Inc.

Settlement negotiations are currently under consideration by the parties, and we will notify you if they proceed.

Please call me at 301-415-1610 or Susan Fonner at 301-415-1629, if you need to contact us.

Sincerely,

/RA/

John Szabo

Enclosure: As Stated

cc: Leonard Birnbaum, Esq.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE ADMINISTRATIVE LAW JUDGE JERRY M. HERMELE

In the matter of)
)
PAL CONSULTANTS, INC.)
14380 Story Road)
San Jose, CA 95127-3818)
)
and) Docket No. 01-01-PF
)
NICK PAL)
Pal Consultants, Inc.)
14380 Story Road)
San Jose, CA 95127-3818)

NRC REVIEWING OFFICIAL'S INTERROGATORIES,
REQUESTS FOR ADMISSIONS, AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
ADDRESSED TO RESPONDENTS NICK PAL AND PAL CONSULTANTS, INC.,

The following Interrogatories, Requests for Admissions, and Requests for Production of Documents are addressed to you by the Reviewing Official of the United States Nuclear Regulatory Commission in the above-captioned proceeding under the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801-3812, and NRC implementing regulations at 10 C.F.R. Part 13. The response to each Interrogatory shall include all pertinent information available to each of the Respondents. Unless other arrangements are made by agreement of the parties, responses to interrogatories and requests for admissions and production of documents shall be delivered to the undersigned attorneys at the Office of the General Counsel, U.S. Nuclear Regulatory Commission, 11555 Rockville Pike, Mail Stop O-15D21, Rockville, Maryland 20852, or they may be mailed to the undersigned attorneys at the following address: Office of the General Counsel, United States Nuclear Regulatory Commission, Mail Stop O-15D21, Washington, DC 20555.

PART ONE -- INTERROGATORIES

Instructions

A. You are required to answer the Interrogatories separately and fully in writing, under oath or affirmation, and to serve a copy of your answers on the undersigned attorneys, who are representing the NRC Reviewing Official, no later than July 27, 2001.

B. The person answering the Interrogatories is charged with knowledge of what that person knows, which in the case of Respondent Nick Pal includes knowledge acquired in his personal capacity or as President of PAL Consultants, Inc.; what the person's investigators, employees, representatives, and attorney know; what is in the records available to the person; and, what others have communicated to the person, orally or in writing, on which the person intends to rely in this proceeding. The answers should be made accordingly.

C. If in answering these Interrogatories you perceive any ambiguity in construing either an Interrogatory or a definition or instruction relevant to the inquiry contained within an Interrogatory, set forth the matter deemed ambiguous and the construction selected or used in answering the Interrogatory.

D. A request for the identification or description of any fact includes, without limitation, a request for the identification and description of all persons with knowledge of such fact, and all documents relating to such fact.

E. In answering each Interrogatory, set forth the identifying number, letter, etc., of the Interrogatory or portion of the Interrogatory being answered immediately before the answer to the Interrogatory.

F. These Interrogatories are deemed continuing in nature, and require you to file answers promptly if, at any time prior to hearing, you obtain additional or different information responsive to any of these Interrogatories.

G. If you decline to answer any Interrogatory, or any portion of an Interrogatory, based on a claim of privilege or claim of work product protection, you must furnish a statement identifying and describing fully the facts or circumstances alleged to support such claim.

H. Where information or knowledge in your possession is requested, such request includes the knowledge of your agents, representatives and, unless privileged, your attorneys.

I. A request for the identification or description of any fact includes, without limitation, a request for the identification and description of all persons with knowledge of such fact, and all documents relating to such fact.

Definitions

For purposes of these interrogatories --

A. "DCAA" refers to the Defense Contract Audit Agency.

B. "Document" means any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, film, computer storage devices, or any other medium and shall include, without limitation, matter in the form of books, pamphlets, letters, correspondence, telegrams, telexes, facsimiles, reports, memoranda, records, statements, speeches, notebooks, agreements, appointment calendars, studies, working papers, lists, manuals, charts, notes, procedures, orders, instructions, directions, training materials, records, diaries, papers, plans, diagrams, drawings, periodicals, telephone logs, minutes, indices, tapes, data sheets, data cards, minutes, transcriptions, schedules, photographs, sound recordings, films, and any published materials.

C. (1) "Identify", when used in reference to a natural person, means to state the person's full name, present or last known business position, present or last known employer or business affiliation, present or last known home and business addresses, present or last known home and business telephone numbers and e-mail address, and present or last known fax

number.

(2) "Identify", when used in reference to an entity other than a natural person, means to state the entity's full name, the present or last known address of its principal office or place of business, and its present or last known business telephone number, e-mail address, and fax number.

(3) "Identify" and "describe", when used in reference to a document, mean to state the name or title of the document, the type of the document (e.g., letter, memorandum, telegram, chart, contract, etc.), its date, the person or persons who authorized it, the person or persons who signed it, the person or persons who prepared it, the person or persons to whom it was addressed, the person or persons to whom it was sent, and its present location and custodian. If any such document was, but is no longer, in your possession or subject to your control, state what disposition was made of it and explain the surrounding circumstances and the authorization for such disposition, and state the date(s) or approximate date(s) thereof.

D. "NRC" refers to the United States Nuclear Regulatory Commission.

E. "Oral communication" and "conversation" mean every form of non-written communication between or involving more than one person by whatsoever means accomplished.

F. "Person" means any individual or entity, including, but not limited to, all associations, corporations, partnerships, and bodies politic.

G. "Relating to" means constituting, containing, embodying, reflecting, identifying, stating, regarding, dealing with, or in any way pertaining to.

H. "Report" means any communication, written or oral, between an expert witness and a Respondent or any of the Respondent's representatives.

I. (1) "Respondent" means any person whose name appears in the caption to this Interrogatory, and the person's attorneys, agents, employees, representatives, or investigators.

(2) "Respondents" means all Respondents or any Respondent.

J. "You" and "your" mean the person to whom these Interrogatories are addressed and the persons set forth in the definition of "Respondents", and include, but are not limited to, the person's agents, employees, representatives, investigators and, unless privileged, attorneys.

K. The singular includes the plural and the plural includes the singular.

Interrogatories

In answering these interrogatories, fully identify each and every person answering these interrogatories, and if the person who signs the answers to these interrogatories is not the person who prepared the answers, then identify the person who prepared the answers, including the person's name, address, telephone number, occupation, and relationship to the person who signs the answers.

Interrogatory 1.

Identify the person who prepared the answers to these interrogatories.

Interrogatory 2.

Identify any present or former officer, employee, consultant, contractor, or representative of Respondents who has knowledge of or was involved in carrying out Contract No. NRC 04-91-073.

Interrogatory 3

Identify any individual or entity who provided services at any time to Respondents in regard to keeping records or reporting of costs incurred by Respondents in carrying out Contract No. NRC 04-91-073.

Interrogatory 4.

Identify any present or former officer, employee, consultant, contractor, or representative of Respondents with whom any other present or former officer, employee, consultant, contractor, or representative of Respondents communicated orally or in writing regarding the audit of Contract No. NRC 04-91-073. Attach to the response to this Interrogatory a copy of any document in the possession of Respondents that incorporates or refers to any such oral or written communication. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 5

Identify any employee of the DCAA with whom any present or former officer, employee, consultant, contractor, or representative of Respondents communicated orally or in writing regarding the audit of Contract No. NRC 04-91-073. Attach to the response to this Interrogatory a copy of any document in the possession of the Respondents that incorporates or refers to any such oral or written communication that is in the possession of Respondents or any officer, employee, consultant, contractor, or representative of Respondents. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 6

Identify any person not named in response to Interrogatory 5 or 6 with whom any present or former officer, employee, consultant, contractor, or representative of Respondents communicated orally or in writing regarding the audit of Contract No. NRC 04-91-073. Attach to the response to this Interrogatory a copy of any document in the possession of Respondents that incorporates or refers to any such oral or written communication. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 7

Identify any present or former NRC employee with whom any present or former officer, employee, consultant, contractor, or representative of Respondents discussed any payment or lack of payment by NRC to Respondents under Contract No. NRC 04-91-073 or the audit of that contract by the DCAA.

Interrogatory 8.

Identify any person Respondents intend to call as a witness at the trial in this proceeding.

Interrogatory 9

With respect to any person listed in response to Interrogatory 8, set forth the subject matter and facts to which that person will testify.

Interrogatory 10

Identify each document Respondents intend to rely on in this proceeding. Attach to the response to this Interrogatory a copy of each such document in the possession of Respondents. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 11

As to each document listed in Interrogatory 10, state whether or not Respondents intend to seek to move such document into the record as evidence in this proceeding.

Interrogatory 12

As to each document listed in response to Interrogatory 10 that Respondents intend to seek to introduce into the record as evidence in this proceeding, state what fact or opinion Respondents intend to establish if the document is admitted into evidence.

Interrogatory 13

State Respondents' tax identification numbers.

Interrogatory 14

Have Respondents paid, or attempted to pay, any portion of the judgment rendered against Respondents by the June 23, 2000 decision of the presiding Administrative Judge on the counterclaim asserted by the NRC against Respondents in the proceeding instituted by Respondents before the Department of Energy Board of Contract Appeals in regard to NRC's denial of certain of Respondents' claims for recovery of costs allegedly incurred under Contract No. NRC 04-91-073?

Interrogatory 15

If the answer to Interrogatory 14 is "yes," describe the amount of payment that has been made by Respondents, or if no payment has been made by Respondents, describe the efforts that have been made by Respondents to make such payment.

Interrogatory 16

If the answer to Interrogatory 14 is "no," state the reasons why no payment has been made or attempted to be made by Respondents on the June 23, 2000 decision of the presiding Administrative Judge on the counterclaim asserted by the NRC against Respondents in the proceeding instituted by Respondents before the Department of Energy Board of Contract Appeals.

Interrogatory 17

Was the attachment to the letter of September 23, 1997, from Joseph P. Riden, DCAA Branch Manager, showing Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073 as \$37,150, the first time Respondents saw or heard that figure attributed to Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073?

Interrogatory 18

If the answer to Interrogatory 17 is “no” --

(a) when did Respondents first see or hear the figure \$37,150 attributed to Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073?

(b) who or what was the source of that information?

Interrogatory 19

If the answer to Interrogatory 17 is “no” --

(a) identify any document prepared or received by any present or former officer, employee, consultant, or contractor of Respondents before September 23, 1997, that attributes the figure \$37,150 to Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073. Attach to the response to this Interrogatory a copy of any such document in the possession of Respondents. If not shown on the face of the document, provide the date and author of the document.

(b) if any present or former officer, employee, consultant, or contractor of Respondents received information attributing the figure \$37,150 to Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073 from a source other than a document, identify the source.

Interrogatory 20

Identify any document prepared or received by any present or former officer, employee, consultant, or contractor of Respondents on or after September 23, 1997, that attributes the figure \$37,150 to Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073. Attach to the response to this Interrogatory a copy of any such document in the possession of Respondents. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 21

On or after September 23, 1997, and before the Respondents filed a complaint on July 21, 1999, with the Department of Energy Board of Contract Appeals concerning claims that had been denied under Contract # NRC 01-91-073, was there any oral or written communication between any present or former DCAA or NRC employee and any present or former officer, employee, consultant, contractor, or representative of Respondents regarding the Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073?

Interrogatory 22

If the answer to Interrogatory 21 is "yes" --

(a) describe any oral or written communication that (i) took place on or after September 23, 1997, and before the Respondents filed the complaint referred to in Interrogatory 21, (ii) was between any present or former DCAA or NRC employee and any present or former officer, employee, consultant, contractor, or representative of Respondents, and (iii) related to Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073.

(b) identify the person(s) who initiated and those who received each such communication.

Interrogatory 23

If the answer to Interrogatory 21 is "yes," identify any document that makes reference to any communication described in the response to Interrogatory 22. Attach a copy of each such document to the response to this Interrogatory. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 24

Describe the discussion that took place on or about December 4, 1997, between Respondent Nick Pal and Gilbert Lew, a DCAA auditor, at the time Gilbert Lew hand delivered

to Nick Pal a letter from Joseph P. Riden, DCAA Branch Manager, dated December 4, 1997, showing a corrected Other Direct Costs figure of \$8,216 for Fiscal Year 1991 under Contract # NRC 04-91-073.

Interrogatory 25

After December 4, 1997, and before Respondents filed the complaint referred to in Interrogatory 21, did Respondents obtain or find any written or oral information not previously known to them that related to the figure for Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073?

Interrogatory 26

If the answer to Interrogatory 25 is “yes,” describe the new information Respondents obtained or found that related to the Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073. Attach to the response to this Interrogatory a copy of any document that contains such information that is in the possession of Respondents. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 27

At the hearing held on March 7-8, 2000, on the complaint filed by Respondents with the Department of Energy Board of Contract Appeals regarding claims that had been denied under Contract # NRC 01-91-073 was Respondent Nick Pal asked whether he could produce any documentation to support Respondents’ claim that the correct figure for Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073 was \$37,150?

Interrogatory 28

If the answer to Interrogatory 27 is “yes,” what was Respondent Nick Pal’s response to the question whether he could produce any documentation to support Respondents’ claim that the correct figure for Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073

was \$37,150?

Interrogatory 29

If the answer to Interrogatory 27 is “yes,” identify any documentation that was submitted by Respondents to support Respondents’ claim regarding Other Direct Costs in the proceeding on the complaint described in Interrogatory 27. Attach to the response to this Interrogatory a copy of any document in the possession of Respondents that was submitted in the proceeding to provide such documentation. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 30

How did Respondent Nick Pal explain the basis for his view that the figure of \$37,150 was correct during the hearing held on March 7-8, 2000, on the complaint filed by Respondents with the Department of Energy Board of Contract Appeals regarding claims that had been denied under Contract # NRC 01-91-073?

Interrogatory 31

State the address, telephone number, fax number, e-mail address, and tax identification number of Respondent Nick Pal.

Interrogatory 32

State the address, telephone number, fax number, e-mail address, and tax identification number of Respondent Pal Consultants, Inc.

Interrogatory 33

Describe the position or positions held, and duties performed, by each individual who was an officer of Respondent Pal Consultants, Inc., for each year since its incorporation, and describe the duties of each such officer. Provide each such officer’s name.

Interrogatory 34

State the name, address, and telephone number last known to Respondents for each employee of Respondents who worked for Respondents after December 31, 1990, on any matter related to Contract # NRC 01-91-073, and describe the period of employment and the duties of each such employee.

Interrogatory 35

State the name, address, telephone number, fax number, and e-mail address last known to Respondents for each consultant, contractor, or subcontractor who worked for Respondents after December 31, 1990, on any matter related to Contract # NRC 01-91-073. Identify the nature of the work performed by each such consultant, contractor, or subcontractor.

Interrogatory 36

State the basis for Respondents' asserted claim to the NRC and to the Department of Energy Board of Contract Appeals that the correct figure for Other Direct Costs for Fiscal Year 1991 under Contract # NRC 04-91-073 was \$37,150.

Interrogatory 37

Did any officer, employee, or representative of Respondents receive any correspondence from the NRC or DCAA, other than the letter of December 4, 1997, showing a corrected Other Direct Costs figure of \$8,216 for Fiscal Year 1991 under Contract # NRC 04-91-073?

Interrogatory 38

If the response to Interrogatory 37 is "yes," what reason did the correspondence provide for the change from the figure listed by the DCAA for Other Direct Costs in the letter referred to in Interrogatory 17?

Interrogatory 39

If the answer to Interrogatory 37 is yes, identify any correspondence received from the NRC or DCAA by an officer, employee, or representative of Respondents showing a corrected Other Direct Costs figure of \$8,216 for Fiscal Year 1991 under Contract # NRC 04-91-073.

Attach to the response to this Interrogatory a copy of any such correspondence in the possession of Respondents. If not shown on the face of the correspondence, provide the date and author of the correspondence.

Interrogatory 40

After receiving the letter referred to in Interrogatory 17, did any officer, employee, or representative of Respondents communicate with any employee of the NRC or DCAA, orally or in writing, regarding the Other Direct Costs figure for Fiscal Year 1991 under Contract # NRC 04-91-073?

Interrogatory 41

If the answer to Interrogatory 40 is "yes," describe each oral or written communication that took place, after Respondents received the letter referred to in Interrogatory 17, between any officer, employee, or representative of Respondents and any employee of the NRC or DCAA regarding the Other Direct Costs figure for Fiscal Year 1991 under Contract # NRC 04-91-073. Attach to the response to this Interrogatory a copy of any document in the possession of the Respondents that incorporates or refers to any such oral or written communication. If not shown on the face of the document, provide the date and author of the document.

Interrogatory 42

Identify each document that supports Respondents' claim that the correct amount for Other Direct Costs for Fiscal Year 1991 is \$37,150 under contract No. NRC 04-91-073. Attach to the response to this Interrogatory a copy of any document identified in response to this

Interrogatory that is in the possession of the Respondents. If not shown on the face of the document, provide the date and author of the document.

PART TWO -- REQUESTS FOR ADMISSIONS

The Definitions and Instructions sections of Part One, Interrogatories, also apply to Part Two, Requests for Admissions.

Respondents are requested to make the following admissions:

1. Admit that Respondent Nick Pal signed Contract #NRC 04-91-073 on July 19, 1991, whereby Pal Consultants, Inc., contracted to perform Human Factors research in support of the regulatory function of the NRC (Contract #NRC 04-91-073).

2. Admit that Respondent Nick Pal was the majority owner of Pal Consultants, Inc., in 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, and 2000.

3. Admit that Respondent Nick Pal was the chief executive officer of Pal Consultants, Inc., in 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, and 2000.

4. Admit that neither the DCAA auditor who audited Respondents' records, any other DCAA employee, nor any NRC employee informed Respondent Nick Pal that his signing of the letter of September 23, 1997, resulted in a binding obligation on the part of the NRC to pay to Respondents the amounts set forth in the letter or in an attachment to the letter showing Other Direct Costs. (The letter of September 23, 1997, informed Respondents of the DCAA findings on indirect rates for Contract #NRC 04-91-073.)

5. Admit that neither the DCAA auditor who audited Respondent Respondents' records, any other DCAA employee, nor any NRC employee advised Respondent Nick Pal that the figures set forth in the letter of September 23, 1997, or in an attachment to the letter showing Other Direct Costs, could not be corrected later to cure a mistake.

6. Admit that on or about December 4, 1997, DCAA auditor Gil Lew hand delivered to Respondent Nick Pal a letter dated December 4, 1997, showing \$8,216 as the correct figure for Other Direct Costs under Contract #NRC 04-91-073.

7. Admit that DCAA auditor Gil Lew spoke to Respondent Nick Pal about the contents of the letter dated December 4, 1997, at the time Gil Lew hand delivered the letter to Respondent Nick Pal.

8. Admit that at the time DCAA auditor Gil Lew hand delivered the letter dated December 4, 1997, Gil Lew spoke to Respondent Nick Pal about the change made in the Other Direct Costs figure.

9. Admit that Respondents received one or more letters from the NRC contracting officer in 1998 stating that due to a typographical error the amount due to Respondents under Contract #NRC 04-91-073 had been misstated.

10. Admit that in 1998, subsequent to receiving one or more letters from the NRC contracting officer stating that due to a typographical error the amount due to Respondents under Contract #NRC 04-91-073 had been misstated, Respondent Nick Pal sent letters to the NRC about the amount owed him on Contract #NRC 04-91-073.

11. Admit that in letters sent by Respondent Nick Pal to the NRC in 1998 about the amount owed to Respondents under Contract #NRC 04-91-073, or in an attachment to the letter, Respondent Nick Pal asserted that \$37,150 was the correct figure for Other Direct Costs.

12. Admit that in the appeal to the Department of Energy Board of Contract Appeals that Respondents initiated on December 26, 1998, Respondents asserted in filings submitted to the Board that \$37,150 was the correct figure for Other Direct Costs under Contract #NRC 04-91-073.

13. Admit that in the hearing of March 7-8, 2000, on the appeal to the Department of

Energy Board of Contract Appeals that Respondents initiated on December 26, 1998, Respondent Nick Pal stated that \$37,150 was the correct figure for Other Direct Costs under Contract #NRC 04-91-073.

14. Admit that in the hearing of March 7-8, 2000, on the appeal to the Department of Energy Board of Contract Appeals (which the Respondents initiated on December 26, 1998) Respondent Nick Pal was unable to supply any documentation that could be used to support his statement that \$37,150 was the correct figure for Other Direct Costs under Contract #NRC 04-91-073.

15. Admit that in the April 21, 2000 decision of the Department of Energy Board of Contract Appeals, the claim of Respondents for the difference between the amount of \$37,150 that Respondents asserted was owed to them for Other Direct Costs under Contract # NRC 04-91-073 and the amount of \$8,216 that NRC allowed for such costs (which difference is \$28,964) was expressly dismissed with prejudice.

16. Admit that in the hearing of March 7-8, 2000, on the appeal to the Department of Energy Board of Contract Appeals that Respondents initiated on December 26, 1998, the presiding Judge stated that the claim for \$37,150 for Other Direct Costs under Contract #NRC 04-91-073 was a "phantom" claim.

PART THREE -- REQUESTS FOR PRODUCTION OF DOCUMENTS

The Definitions and Instructions sections of Part One, Interrogatories, also apply to Part Three, Requests for Production of Documents.

In addition to the documents requested in Interrogatories 1 through 42, produce copies of the following documents:

1. All correspondence, notes, memoranda, or other documents exchanged between any

officer, employee, or representative of Respondents and the Small Business Administration relating to Other Direct Costs under Contract No. NRC 04-91-073.

2. All documents correspondence, notes, memoranda, or other documents exchanged between any officer, employee, or representative of Respondents and any employee of the DCAA Audit Agency relating to Other Direct Costs under Contract No. NRC 04-91-073.

2. All correspondence, notes, memoranda, or other documents exchanged between any officer, employee, or representative of Respondents and any person providing bookkeeping or accounting services to the Respondents relating to Other Direct Costs under Contract No. NRC 04-91-073.

3. All correspondence, notes, memoranda, or other documents not covered in Request 3 that were exchanged between any officer, employee, or representative of Respondents and any person providing services to the Respondents relating to Other Direct Costs under Contract No. NRC 04-91-073.

4. All correspondence, notes, memoranda, or other documents that were submitted by Respondents to the Department of Energy Board of Contract Appeals in regard to Respondents' claims concerning Other Direct Costs under Contract No. NRC 04-91-073.

5. All correspondence, notes, memoranda, or other documents exchanged between any officer, employee, or representative of Respondents and any person not covered under Requests 1-4 concerning Other Direct Costs under Contract No. NRC 04-91-073.

Respectfully submitted,

Dated: July 2, 2001

Susan Fonner
John Szabo
Counsel for NRC Reviewing Official

/RA/
By: John Szabo

BY OVERNIGHT MAIL

July 2, 2001

The Honorable Jerry M. Hermele
Administrative Law Judge
National Labor Relations Board
1099 14th Street, N.W.
Washington, DC 20570

Subject: In the matter of Pal Consultants, Inc., and Nick Pal,
Docket No. 01-01-PF

Dear Judge Hermele:

Enclosed please find a copy of the NRC Reviewing Official's interrogatories, request for admissions, and request for production of documents addressed to Respondents in the above-named matter, Nick Pal and Pal Consultants, Inc.

Settlement negotiations are currently under consideration by the parties, and we will notify you if they proceed.

Please call me at 301-415-1610 or Susan Fonner at 301-415-1629, if you need to contact us.

Sincerely,

John Szabo

Enclosure: As Stated

cc: Leonard Birnbaum, Esq.

DOCUMENT NAME: G:\GC\PAL_Documents\PAL Interrogatory.wpd

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