

CAMEO DIAGNOSTIC CENTRE, INC.

SPECIALIZED MEDICAL IMAGING AND MEASUREMENTS

155 MAPLE STREET / SPRINGFIELD, MA 01105

(413) 788-7000

March 11, 1994

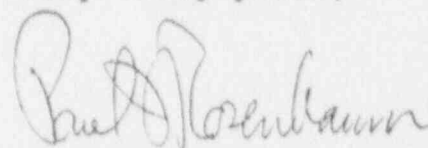
Honorable Ivan W. Smith, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: DOCKET NO.
030-29567

Dear Judge Smith,

In order to assure being in complete conformance with all regulations and requirements, submitted herewith are copies of two documents that may impact the above proceeding and therefore possibly be significant from a legal point of view.

Very truly yours,



Paul J. Rosenbaum

cc: C.L. Marco, ESQ.

9403300123 940317
PDR ADOCK 03029567
C PDR

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAMEO DIAGNOSTIC CENTRE, INC.)

Plaintiff,)

v.)

KEITH BROWN)

Defendant.)

Civil Action No.
94-30036-F

MOTION TO DISMISS

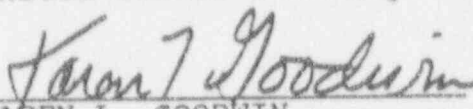
The defendant the United States of America, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, moves to dismiss the plaintiff's complaint. The defendant has submitted a memorandum of law in support of this motion.

In accordance with Local Rule 7.1, the undersigned Assistant U. S. Attorney states that she has discussed this motion with the pro se plaintiff, but was unable to resolve the issues.

Respectfully submitted,

DONALD K. STERN
United States Attorney

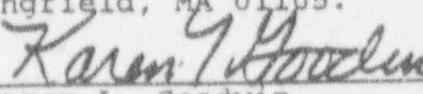
By:


KAREN L. GOODWIN
Assistant U.S. Attorney
1550 Main Street
Springfield, MA 01103

Dated: March 1, 1994

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been served by first class mail on this date to Cameo Diagnostic Centre, Inc., 155 Maple Street, Springfield, MA 01105.


Karen L. Goodwin
Assistant U.S. Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAMEO DIAGNOSTIC CENTRE, INC.)

Plaintiff)

v.)

KEITH BROWN)

Defendant)

Civil Action No.
94-30036-F

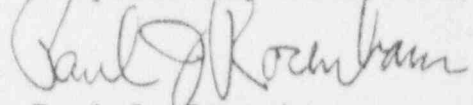
MOTION TO DENY MOTION TO DISMISS

The plaintiff submits herein motion and states the following:

1. The defendant in this matter is not the United States of America.
2. The defendant is an inspector for the Nuclear Regulatory Commission.
3. The defendant, acting with demonstrable personal animus, did distort facts in a report that negatively impacted plaintiff.
4. The defendant acted outside the normal scope of his work.
5. The defendant's status as a federal employee does not have immunity from being held accountable for deliberate lying.

Plaintiff pleads that its owner be given the opportunity to be heard and examine the defendant under oath.

Respectfully submitted,




Paul J. Rosenbaum

Dated: March 3, 1994

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been served by first class mail on this date to Assistant U.S. Attorney, 1550 Main Street, Springfield, MA 01103



Paul J. Rosenbaum