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December 18, 2001

*100-02-0096
30 Jan 02*

VIA E-MAIL

Michael R. Lund, Esq.
Acquisition Law Services Division
OO-ALC/JAN
6026 Cedar Lane, Building 1278
Hill Air Force Base, Utah 84056-5812

**RE: General Atomics v. ES3
San Diego Superior Court No. GIC 752678
Our File No. 100940-00001**

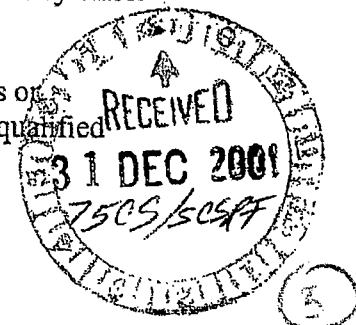
Dear Mr. Lund:

Consistent with our discussion at Mr. Lindquist's deposition on Tuesday, the following will represent the documents jointly requested by the parties to the above referenced litigation. This request is made to you both informally and as an official request for documents under the Freedom of Information Act. I am sending a copy of this letter to Mary Maynard who I understand is the acting Freedom of Information Manager, Support Flight at Hill Air Force Base.

Recall that in our litigation we have a protective order to protect confidential information, for purposes of our litigation. The documents produced will be governed by that protected order and designated "Confidential." The following describes the information we request.

1. Any and all documents, writings or computer disks (preferably on CD ROM) which refer, reflect and/or evidence the delivery of data deliverables by General Atomics to Hill Air Force Base pursuant to the SPARES (contract No. F33615-90-C5002) and SPARES II (contract No. F42650-97-D0015) contracts and any amendments thereto.
2. Any and all documents, memoranda or other data which refer or relate to any effort by General Atomics to maintain rights in the data delivered.
3. Any and all documents which evidence refer or relate to Mr. Lindquist's or Mr. Galey's review of the technical or cost proposals submitted by any qualified

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bidder on the SPARES III procurement efforts in July of 2000, October of 2000 and February of 2001 including, but not limited to, documents evidencing the scoring of the technical proposals by Hill Air Force Base which were transmitted to the General Services Administration.

4. Any and all documents, memoranda, e-mails or other writings which refer or relate to General Atomics performance of the SPARES II follow-on work, including but not limited to a memoranda from Mr. Lindquist to Mr. Galey concerning that subject.
5. Any and all documents which refer or relate to any Congressional inquiry, investigation, or analysis of the SPARES project including any drafts or writings responding to said inquiries or notes relating to conversations with Congressional liaisons or others concerning said inquiries.
6. Any and all funding documents relating to the SPARES III contract including the MIPR request submitted to GSA for the procurement process.
7. Any and all e-mails from Mr. Lindquist that evidence, refer or relate to the transmission of jokes to third parties from June 2000 through December 2000.

I appreciate your anticipated cooperation in this regard. Please advise me of the costs of reproduction and we will provide you a check for processing the requests.

If you should have any questions concerning the above, please feel free to give me a call.

Sincerely yours,



JAMES M. PETERSON
of
HIGGS, FLETCHER & MACK LLP

JMP/ik

cc: Mary Maynard
Nancy Dix, Esq.