

## **Exhibit D**

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May 6, 2002

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By FACSIMILE AND U.S. MAIL

Shahram A. Shayesteh
Girardi & Keese
1126 Wilshire Boulevard
Los Angeles, CA 90017

Re: United States ex rel. Nira Schwartz v. TRW Inc. and Boeing North America, No. CV 96-3065

Dear Shahram:

I am writing in response to your April 24, 2002 letter regarding TRW's responses to Plaintiff's Request for Production of Documents, Set Eleven. In that letter, you asked us to clarify some our responses and objections.

First, we have not withheld any responsive documents on the basis of attorney-client privilege, work product doctrine, or any other applicable privilege.

Second, we have not withheld any responsive documents on the ground that they are classified, nor have we intentionally divulged any classified information to unauthorized parties.

Third, we are aware of no authority that compels a party responding to a Rule 34 document request to specifically identify (by bates number or otherwise) documents already in the requesting party's possession that may be responsive to the request. Nevertheless, in the interests of facilitating discovery, we are willing to tell you that the only responsive documents we did not produce a second time - because they are already in Plaintiff's possession - are the medical records and reports that were generated in connection with your client's worker's

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RECEIVED TIME MAY. 6. 4:54PM

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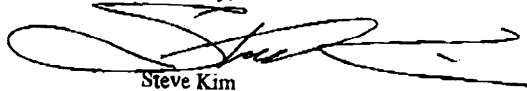
Shahram A. Shayesteh  
May 6, 2002  
Page 2

compensation proceeding. We previously produced these documents to your client in response to a prior document request.

Finally, TRW's general objections are entirely appropriate and need not be amended or withdrawn.

We trust this fully addresses the issues you raised in your April 24th letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Kim", with a large, sweeping flourish underneath.

Steve Kim

**G | K**

**GIRARDI | KEESE**  
LAWYERS

**FACSIMILE TRANSMITTAL COVER LETTER**

<b>TO:</b> Broadus Spivey (512) 474-1605	<b>FROM:</b> Shahram A. Shayesteh
Joe Egan (703) 918-4943	PAGES: 2 enclosed
Charlie Fitzpatrick (210) 820-2668	DATE: May 6, 2002
David Affeld (213) 229-0085	
Nira Schwartz (310) 782-9074	

**RE: SCHWARTZ V. TRW**

*If you do not receive full transmission as indicated by number of pages set forth above, please call (213) 977-0211 ext. 510, or ask for the name in the "From" portion of this cover letter as soon as possible.*

COMMENTS:

Please see enclosed.

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