

U. S. DEPARTMENT OF TRANSPORTATION

Office of Hearing
Washington, D.C.

111783

2000 JUN 26 P 12:40

OFFICE OF CHIEF COUNSEL
HEARING DOCKET

Vanguard Airlines, Inc.

FAA 2000-7455-8

FAA DOCKET NO. CP *not yet assigned*

(EIR 199-GL-31-0054)

(Civil Penalty Action)

CP00910018

Administrative Law Judge James W. Lawson

REQUEST FOR DISCOVERY

Vanguard Airlines, Inc., by and through its Vice President and General Counsel hereby requests that Complainant, within 30 days after service of this document, supply him the following information and documents:

1. The name, occupation, phone number, and business address for each person whom the Complainant knows or believes has knowledge of any facts that will tend to prove or disprove the facts alleged in the complaint or the answer filed in this proceeding.
2. A summary of the facts and opinions to which each of the persons identified in response to request #1 can be expected to testify.
3. Copies of all statements, written or recorded, made by each of the persons identified in response to request #1 that are in the possession or control of

the Complainant or any of its employees or agents not otherwise provided in previous correspondence.

4. Copies of all notes or memoranda, written or recorded, that record or summarize statements made by persons identified in response to request #1 that are in the possession or control of the Complainant or any of its employees or agents including information previously withheld under Exemption 5 of the FOIA.

5. Copies of all documents in the possession of the Complainant, or any of its employees or agents, that the Complainant knows or believes will tend to prove or disprove the facts alleged in the complaint or the answer filed in this proceeding.

Served this 20th day of June, 2000.



Brian S. Gillman
Vice President and General Counsel
Vanguard Airlines, Inc.
533 Mexico City Avenue
Kansas City, MO 64153
(816) 243-2102 telephone
(816) 243-2165 facsimile

I hereby certify that the foregoing **REQUEST FOR DISCOVERY** has been mailed this 20th day of June 2000, by first class mail, to the following:

Original and one copy:

Hearing Docket (original and one copy)
Federal Aviation Administration
800 Independence Avenue, S. W.
Room 924A
Washington, D.C. 20591
Attn: Hearing Docket Clerk

One copy:

Mr. Chris Zurales, Esq.
U.S. Department of Transportation
Federal Aviation Administration
Regional Counsel, AGL-7
2300 East Devon Avenue
Des Plaines, IL 60018-4696

Dated this 20th day of June 2000.



Shawna M. New
Corporate Paralegal
Vanguard Airlines, Inc.