



Babcock & Wilcox

a McDermott company

20 S. Van Buren Avenue
P.O. Box 351
Barberton, OH 44203-0351
(330) 753-4511

August 5, 2002

Ms. Elisabeth Anderson
Trine & Metcalf
1435 Arapahoe Ave.
Boulder, CO 80302-6390

Subject: Release For Employment Records pertaining to George Apodaca

We are in receipt of the Release issued to Babcock & Wilcox for the production of documents and records pertaining to George Apodaca. Since we are in Chapter 11 bankruptcy reorganization and have limited resources, we will produce the requested documents and records as they are kept in the usual course of business at our offices in Barberton, Ohio and permit you to search the records for the requested information and make copies thereof at your own expense.

Alternatively, we would be willing to conduct the search ourselves and to make copies for you; provided, however, that we are allowed a reasonable time to conduct such work and provided further that we are reimbursed in advance for the reasonable costs of searching for, obtaining, and copying the requested documents and records. Based upon a preliminary review of the subpoena, we estimate the costs as follows:

Records Search and Records Retrieval: \$125.00
Copying: 25 cents per page
Handling and Mailing: 5.00
Do not send check until we advise you of the page count

Please advise us at once which course of action you wish to follow. My direct dial number is (330)860-1516.

In the event that you chose the latter course, you will need to send us your check for the total amount, prior to shipment of the documents and records. **Again, do not send check until we advise you of the page count.** We will advise you of the page count as soon as we have completed the records search.

Sincerely,

David J. Black
Paralegal
Law Dept.

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