

MEMORANDUM

To: Chuck McCrea, Esq.

From: Bill Snyder

Date: March 11, 1992

Re: Nevada Power

Dear Chuck:

- A) The docket clerk for #90-16179, informs me that the process of the Judge's voting on the defendants rehearing motion generally takes 4-8 weeks.
- B) Paul will be in Oregon for the next 5-7 days for some much needed R&R. He will forward a memo to you re the preliminary research to be done in the event that the plaintiff's are asked to submit a brief. Also, he'll have some thoughts on the scheduling conference strategy, etc.
- C) You have a complete list of the utility co's that have evidenced an interest in this case. I'll update you as we go along.
- D) David, Paul and I will put our heads together to come up with a list of critical names to notice for immediate depositions.
- E) At some point, we need a letter from an appropriate financial/management official of N.P. that generally outlines their damages; Elements of damages should include costs of:
 - 1) Testing & investigation.
 - 2) Re-testing & monitoring.
 - 3) Removal & retro-fill.
 - 4) Replacement.
 - 5) Storage & transportation.
 - 6) Disposal.

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These costs should cover all PCB and PCB contaminated equipment.

At a later date, we will also need a very specific outline of the above, indicating dates, serial numbers, places, etc.

I'll be in touch soon.

Regards,



William H. Snyder

WHS/ih

cc: Paul Merrell
David McCrea