

MEMORANDUM

TO : Ralph Bradley
FROM : Holly Dewar
DATE : July 7, 1993
RE : Remaining depositions to be scheduled

The following depositions of WEC and GE people are currently under discussion between Paul and defense counsel:

WEC - PMK re destruction of documents

Jeffrey Bair

C.W. Bickerstaff

Robert "Don" McClain

Roger Wills

PMK re hazards

PMK re librarian

PMK re trade associations

GE - PMK re document retention

PMK re trade associations

PMK re hazards (expect S. Hamilton)

John Brown

Manny Neal (if doc retention person is insufficient)

Your thoughts and comments are hereby solicited.

/hcd

NEVADA POWER v. MONSANTO, ET AL.

Review of NPC's 1989 document production at Alverson & Taylor's
office 12/28/92:

NPC's EXH. #	ATM&N HAND-WRITTEN #s	NPC'S #s
1 (NPC ?)	1 - 827	
2 (NPC ?)	828 - 976	
3	977 - 987	2039 - 2049
4	988 - 1025	1 - 38
5	1026 - 1053	39 - 66
6	1054 - 1106	67 - 119
7	1107 - 1262	120 - 274
8	1263 - 1486	275 - 856
9	1487 - 1550	857 - 920
10	1551 - 1665	921 - 1036
11	1666 - 1772	1037 - 1044
12	1773 - 1804	1145 - 1176
13	1805 - 1855	1177 - 1227
14	1856 - 1894	1271 - 1309
15	1895 - 1937	1228 - 1270
16	1938 - 1999	1310 - 1371
17	2000 - 2184	1372 - 1558
18	2185 - 2252	1559 - 1626
19	2253 - 2404	1627 - 1778
20	2405 - 2510	1779 - 1883
21	2511 - 2577	1883 - 1951
22	2578 - 2665	1952 - 2038
23	2666 - 2861 & 14467 - 14660 (duplicate)	2039 - 2245 2246 - 2687 MISSING (Exh. 31-33 has some of these #s from original stamping, then crossed out & re-numbered)
24	3247 - 3346	2688 - 2786
25	3347 - 3463	2787 - 2902
26	3464 - 3839	2903 - 3278

27	3840 - 3971	3279 - 3410
28	3972 - 4085	3411 - 3523
29	4086 - 4584	3524 - 3823
30	4585 - 4782	3824 - 4030
		3828 - 3837
		MISSING
31	4783 - 4958	4031 - 4206
32	4959 - 4995	4207 - 4243
33	4996 - 5036	4244 - 4284
34	5037 - 5277	4285 - 4528
35	5278 - 5506	4529 - 4815
36	5507 - 5539	4816 - 4848
37	5540 - 5590 (s/b 5564)	4849 - 4873
38	5591 - 5813	4874 - 5153
	s/b 5565	
39	5814 - 5966	5154 - 5307
40	5967 - 6022	5308 - 5363
41	6023 - 6056	5364 - 5397
42	6024 - 6046	5398 - 5420
43	6047 - 6215	5421 - 5589
44	6216 - 6263	5590 - 5637
45	6264 - 6409	5638 - 5783
46	6410 - 6421	5784 - 5795
47	6422 - 6433	5796 - 5807
48	6434 - 6476	5808 - 5850
49	6477 - 6594	5851 - 5968
50	6595 - 6612	5969 - 5986
51	6613 - 6717	5987 - 6092
52	6718 - 6746	6093 - 6120
53	6747 - 6771	6121 - 6145
54	6772 - 6903	6146 - 6257
55	6904 - 6937	6258 - 6291
56	(56-1) 6938 - 6952 (duplicate (56-2) 6953 - 6967 of each other)	6292 - 6306
57	6968 - 7031	6307-6370

58	7032 - 7361	6371 - 6699
59	7362 - 7387	6700 - 6725
60	7388 - 7432	6726 - 6700 (s/b 6770)
61	7433 - 7493	6771 - 6831
62	7494 - 7608	6832 - 6947
63	7609 - 7700	6948 - 7039
64	7701 - 7768	7040 - 7107
65	7769 - 7817	7108 - 7156
66	7818 - 7887	7157 - 7226
67	7888 - 8267	7227 - 7607
	(8207 - 8217 is NPC's missing 7547 - 7557 & is 2-sided)	
68	8268 - 8470	7608 - 7809
69	8471 - 8503	7810 - 7842
70	8504 - 8608	7843 - 7947
71	8609 - 8638	7948 - 7978
72	8639 - 8666	7979 - 8006
73	8667 - 8756	8007 - 8096
74	8757 - 8862	8097 - 8201
75	8863 - 9060	8202 - 8398
	9061 (MISSING)	
76	9062 - 9426	8399 - 8764
77	9427 - 9454	8765 - 8792
78	9455 - 9494	8793 - 8832
79	9495 - 9612	8833 - 8951
80	9613 - 9681	8952 - 9027
81	9682 - 9749	9028 - 9095
82	9750 - 9875	9096 - 9221
83	9876 - 9905	9222 - 9251
84	9906 - 9975	9252 - 9321
85	9976 - 10130	9322 - 9476
86	10131 - 10186	9477 - 9535
87	10187 - 10320	9536 - 9669
88	10321 - 10403	9670 - 9752
89	10404 - 10506	9753 - 9856

90	10507 - 10563	9857 - 9934
91	10564 - 10627	9935 - 9997
92	10628 - 10674	9998 - 10072
93	10675 - 10751	10073 - 10146
94	10752 - 10857	10147 - 10250
95	10859 - 10903	10251 - 10296
96	10904 - 10988	10297 - 10381
97	19898 - 11298 ***	10382 - 10590
98	11299 - 11415	10591 - 10707
99	11416 - 11456	10708 - 10748
100	11457 - 11616	10749 - 10907
101	11617 - 11817	10908 - 11111
102	11818 - 11947	11112 - 11238
		11239 - 11241 (MISSING)
103	(MISSING)	11242 - 11326
104	(MISSING)	11327 - 11434 11292 (MISSING)
105	12356 - 12431	11435 - 11510
106	11948 - 12011	11511 - 11577
107	12012 - 12076	11578 - 11642
108	12077 - 12094	11643 - 11651
109	12095 - 12227	11652 - 11783
110	12228 - 12355	11784 - 11910
111	13258 - 13295 & un-numbered pages	11911 - 11972
112	3 un-numbered pages & 13296 - 13381	11973 - 12112 12112 is handwritten & s/b 12111
113	13382 - 13409	12112 - 12139
114	13410 - 13499	12140 - 12229
115	13500 - 13619	12230 - 12349
116	(MISSING)	12350 - 12628
???	12356 - 13257 NOT PRODUCED BY NPC ???	
???	13620 - 14660 NOT PRODUCED BY NPC ???	

*** ATM&N 11212-11298 is duplicate of documents in #98. ATM&N 11197-11211 is duplicate of NPC 10591-10605, found in #98. NPC 10630-10646 is duplicate of NPC 10613-10629, which is ATM&N 11237-11253 & found in #98.

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FROM:

Holly Dewar

CLIENT/MATTER: Nevada Power v. Monsanto, et al.

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: *X-ref of NPC's 1989 doc production*

NUMBER OF PAGES (Including cover page):

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