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July 21, 1993

BY FACSIMILE

Paul E. Merrell, Esq.
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c/o Jones, Jones, Close & Brown
700 Valley Bank Plaza
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Las Vegas, Nevada 89101-6206

Re: Nevada Power Litigation

Dear Paul:

This concerns your letter of yesterday on the draft stipulation.

GE has agreed to make John Brown available for the continuation of his deposition after July 23. I suppose that if Nevada Power is still interested in taking Dr. Brown's deposition, his name should be included in paragraph A.

GE also requests that the deposition of Fluor Power Services, Inc. be included in paragraph A. On July 13, GE noticed that deposition for July 23, but Fluor informs us that they will not be prepared to produce a witness by then.

GE has also offered to make Mr. Biernacki available after July 23 for a continuation of the 30(b)(6) depositions on document retention and warnings, subject to limitations stated in my July 19 letter to you. Given that we have not yet resolved the conditions attending the continuation of these depositions (other than the fact that they may go forward after the 23rd), it appears that these should be listed in paragraph B.

Finally, as I have previously stated to you, GE agrees that it will not interpose the discovery cut-off as a basis for

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opposing a deposition of Manny Neal. (As you know, we object to that deposition on other grounds.) In light of this agreement and your inclusion of Mr. Neal's name in paragraph B of the draft stipulation, may GE assume that it need not move for a protective order against the taking of Mr. Neal's noticed deposition on July 23? I will assume that the answer is in the affirmative unless I hear otherwise from you. If the answer is no, I would appreciate your letting me know as soon as possible, since we will have to move for a protective order tomorrow.

Sincerely yours,



Robert J. Shaughnessy

cc: Arvin Maskin
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