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OF COUNSEL:

WILLIAM N. WOODSON, III

November 10, 1989

Peggy A. Leen
Thorndal, Backus, Maupin
& Armstrong
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, NV 89125-2070

Re: Nevada Power Co. v. General Electric Corp.

Dear Ms. Leen:

While I normally do not spend time writing letters confirming the substance of phone conversations, I am going to make an exception in your case. This letter concerns my phone conversation with you on November 6, 1989, relating to discovery issues in this case.

I told you during that phone call that the plaintiff's team has given me responsibility for discovery issues involving our responses to defendants' document requests and interrogatories, as well as, the defendants' responses to our written discovery requests. I asked you to coordinate all of those issues with me. A simple request designed to facilitate an efficient resolution of these issues.

Your response was quite remarkable. You stated that you would not participate in the discovery process with me in this case. Somewhat taken aback, I asked for an explanation. You stated that you would not discuss any discovery issues with me because of my "demeanor" and "tenor".

As to demeanor, I've never met you, dealt with you on any case nor have I had any previous dealings with you. I pointed out to you that your assessment appeared rash.

Failing to offer any explanation for your attitude on the "demeanor issue," you pressed hard on "tenor." I thought that remarkable as well since I had never discussed any discovery issue with you in this case before this phone call.

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DATE 11/13/89

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Let me point out to you that I have been dealing with these same defendants on PCB cases throughout the United States for years. While I have had some disputes with national counsel for these defendants in the past, I've not yet met a defense counsel with quite your approach to litigation -- you certainly represent a low (or high) water mark.

I am advised by my co-counsel that all discovery issues outlined in your letter of October 25, 1989 have been tended to and all of those issues are closed.

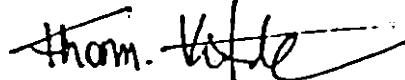
In short, may I suggest that you raise the tenor of your discussions with me a few clicks. I think it will benefit you, your client and the resolution of this case.

Upon reflection, I think you will agree with me that your "ostrich approach" to litigation is both immature and unbecoming.

I am willing to forget your remarks and I am quite sure that you wish that you had not made such silly statements.

On the other hand, if you persist in your present attitude to ignore and refuse to cooperate with opposing counsel in discovery in this case, I will bring the matter to the Court's attention for resolution.

Sincerely,

A handwritten signature in black ink, appearing to read "Thom. Kotoske", with a stylized flourish at the end.

THOMAS E. KOTOSKE

TEK:rry

cc: J. Bruce Alverson
Bruce A. Featherstone
Jeffrey S. Klein
J. Randall Jones