

Telephone: (702) 385-4202

BRADLEY & MERRELL
c/o Jones, Jones, Close & Brown
300 South Fourth Street, Seventh Floor
Las Vegas, Nevada 89101-6026

Fax: (702) 385-1655

July 13, 1993

VIA TELEFAX

John Tatlock, Esq.
Kirkland & Ellis
1999 Broadway, Suite 4000
Denver, Colorado 80202

Re: Nevada Power v. Monsanto, et al.

Dear John:

Regarding the Zornes deposition, I have received the attached letters from Susan Fogleboch and from Mr. Zornes' internist. Please advise whether I should pursue an affidavit from the doctor.

Sincerely,

BRADLEY & MERRELL



PAUL E. MERRELL
Coordinating Attorney

PEM:dd
Enc.
cc: Sue Fogleboch, CLA
evg\cor\tatlock.003

NEVADA POWER COMPANY



13 July 1993

Telecopied 385-1655

PEM
WORKING COPY

Paul Merrell, Esq.
Bradley & Merrell
c/o Jones Jones Close & Brown
300 S. Fourth St., #600
Las Vegas, NV 89101

RE: NPC v. Monsanto et al.

Dear Paul:

Enclosed is a letter I received today via fax. Please advise the Defendants that Mr. Zornes will be unable to attend his deposition currently set for Friday 16 July 1993. As you will read Mr. Zornes' medical condition precludes his attending a deposition. Several years ago Mr. Zornes underwent surgery to remove a tumor from his brain. He is under constant medication. If necessary Dr. Cruvant will execute an affidavit but the doctor's time constraints precluded his doing so at this time.

Sincerely,



Susan E. Fogleboch, CLA
Certified Legal Assistant
(702) 367-5632

SEF

DR. STEPHEN BILLMYER

ID: 702-733-1020

JUL 13 '93 14:30 No.002 P.01

**ETHAN M. CRUVANT, M.D.
DIPLOMATE AMERICAN BOARD OF
INTERNAL MEDICINE**

5000 MARYLAND PARKWAY NO. SUITE 750
LAS VEGAS, NEVADA 89106

PHONE: (702) 788-5786
FAX: (702) 788-5786

July 13, 1993

TO WHOM IT MAY CONCERN

RE: Mr. James Zornes

I am Mr. Zornes internist. Mr. Zornes has several medical problems the most important of which is an inability to have a stable emotional state. He suffers from a form of depression and is being treated with medication at present. His mental abilities are unstable. It is unpredictable as to his ability to concentrate and remember items from the past. I do not expect this problem to appreciably change despite medical treatment.

Sincerely,

E. Cruvant M.D.

Ethan M. Cruvant, M.D.

BMC/pb

NEVADA POWER COMPANY



FAX TRANSMITTAL

TO: Paul
COMPANY: _____
FAX #: 385-1555
PHONE #: _____

FROM: Steve
DEPARTMENT: Legal
FAX #: (702) 367-5629
PHONE #: _____

NO. OF PAGES (including this page) 3

INSTRUCTIONS: _____

DATE: 7/13 TIME: 2:55

If you have any problems with this transmittal

please call: _____

Phone No. _____

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300 South Fourth Street
Las Vegas, Nevada 89101-6026
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7/13/93

TO: John Tatlock, Esq.

FAX #: (303) 291-3334

PHONE #: (303) 291-3000

FROM:

Paul Messell

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

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: letter & attachments

NUMBER OF PAGES (including cover page):

4

MESSAGE:

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IF YOU EXPERIENCE PROBLEMS WITH THIS TRANSMISSION,
please call (702) 385-4202 and ask for: Robert Osterloh, Ext. 615

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Las Vegas, Nevada 89101-8026
(702) 385-4202

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TO: John Tatlock, Esq.

FAX #: (303) 291-3334

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FROM:

Paul Merrell

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*** SEND ***

No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	JOHN TATLOCK	7-13-83 3:33PM	5'32"	4/ 4	EC	COMPLETED 4800

TOTAL 0:05'32" 4

NOTE:

No. : OPERATION NUMBER 48 : 4800BPS SELECTED EC : ERROR CORRECT G2 : G2 COMMUNICATION
PD : POLLED BY REMOTE SF : STORE & FORWARD RI : RELAY INITIATE RS : RELAY STATION
MB : SEND TO MAILBOX PG : POLLING A REMOTE MP : MULTI-POLLING RM : RECEIVE TO MEMORY

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300 South Fourth Street
Las Vegas, Nevada 89101-6026
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7/13/93

TO: Sue Fogleboch

FAX #: (702) 367-5629

PHONE #: (702) 367-5632

FROM: Paul Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: *cc: of letter to John Satlock*

NUMBER OF PAGES (including cover page): 2

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300 South Fourth Street
Las Vegas, Nevada 89101-6028
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1855

DATE: 7/13/93

TO: Sus Fogleboch

FAX #: (702) 367-5629

PHONE #: (702) 367-5832

FROM:

Paul Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION:

cc: of letter to John Tallock

NUMBER OF PAGES (including cover page):

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TOTAL 0:00'48" 2

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