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Attorneys for Defendant GENERAL ELECTRIC COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA POWER COMPANY,	)	CV-S-89-555-LDG-LRL
	)	
Plaintiff,	)	
	)	
vs.	)	DEFENDANT GENERAL
	)	ELECTRIC'S NOTICE
	)	OF DEPOSITION TO
MONSANTO COMPANY, <u>et al.</u> ,	)	FLUOR POWER SERVICES,
	)	INCORPORATED
Defendants.	)	

PLEASE TAKE NOTICE that defendant General Electric Company will take the deposition of FLUOR POWER SERVICES, INC., by the person(s) most knowledgeable about the subjects listed on Exhibit A attached hereto, at 10:00 a.m., Friday, July 23, 1993, in Chicago, Illinois, at a location to be determined. The deponent is commanded to produce at the deposition (or in advance of the deposition) the documents described on Exhibit B attached hereto.

ALVERSON, TAYLOR, MORTENSON
& NELSON
J. Bruce Alverson, Esq.

WILLIAMS & CONNOLLY

By Steven R. Kuney (P/P)
Steven R. Kuney
725 12th Street, N.W.
Washington, D.C. 20005

Dated: July 13, 1993

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July, 1993,
the foregoing Notice of Deposition was served by facsimile on
counsel as follows:

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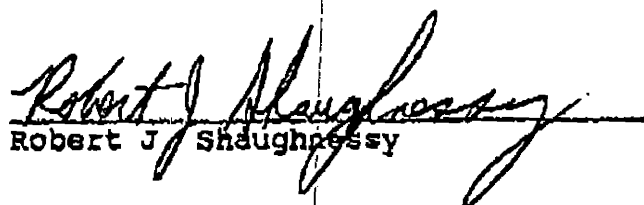

Robert J. Shaughnessy

EXHIBIT A

Fluor Power Services, Inc. ("Fluor") is commanded to produce the person(s) most knowledgeable about the following subjects. Unless otherwise specified, the subjects concern the time period from 1930 to 1978. The term "Nevada Power Company" includes any predecessors in interest of that entity, including Southern Nevada Power Company.

1. Any work performed by Fluor on behalf of Nevada Power Company involving the design or construction of electrical generation, transmission, or distribution facilities.

2. Any work performed by Fluor on behalf of Nevada Power Company involving the recommendation, specification, or acquisition of electrical transformers or capacitors.

3. Any work performed by Fluor on behalf of Nevada Power Company involving the recommendation, specification, or acquisition of the dielectric fluid for electrical transformers or capacitors.

4. Any communications between Fluor and Nevada Power Company relating to electrical transformers or capacitors.

5. Any communications between Fluor and Nevada Power Company from 1930 to the present relating to dielectric fluid containing polychlorinated biphenyls (PCBs). (Such fluid was marketed under various trade names including Aroclor, Pyranol, Inerteen, and was known generically as askarel.)

6. Any communications between Fluor and General Electric Company, Westinghouse Electric Corporation, or Monsanto Company relating to dielectric fluid containing PCBs.

7. The information possessed by Fluor between 1930 and 1978 relating to PCBs.

8. The documents identified in Exhibit B.

EXHIBIT B

Fluor Power Services, Inc. ("Fluor") is commanded to produce all documents in its possession, or the possession of its agents or employees, that evidence, reflect, or relate to the subjects enumerated below. As used herein, the term "document" includes all "writings," "recordings," and "photographs," as those terms are defined in Rule 1001 of the Federal Rules of Evidence. The term "Nevada Power Company" includes any predecessors in interest of that entity, including Southern Nevada Power Company. Unless otherwise specified, these requests concern documents created or acquired by Fluor between 1930 to 1978.

1. Any work performed by Fluor on behalf of Nevada Power Company involving the design or construction of electrical generation, transmission, or distribution facilities.

2. Any work performed by Fluor on behalf of Nevada Power Company involving the recommendation, specification, or acquisition of electrical transformers or capacitors.

3. Any work performed by Fluor on behalf of Nevada Power Company involving the recommendation, specification, or acquisition of the dielectric fluid for electrical transformers or capacitors.

4. Any communications between Fluor and Nevada Power Company relating to electrical transformers or capacitors.

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6. Any communications between Fluor and General Electric Company, Westinghouse Electric Corporation, or Monsanto Company relating to dielectric fluid containing PCBs.

7. Information possessed by Fluor between 1930 and 1978 relating to PCBs.

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300 South Fourth Street
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(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 13, 1993

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:

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