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11 Attorneys for Plaintiff
NEVADA POWER COMPANY
12 a Nevada corporation
13

14 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
15

16	NEVADA POWER COMPANY, etc.,	)	CASE CV-S-89-555-LDG (LRL)
		)	
17	Plaintiff,	)	STIPULATED ORDER
		)	
18	vs.	)	
		)	
19	MONSANTO COMPANY, etc., et al.,	)	
		)	
20	Defendants.	)	
		)	

21
22 All parties to this action, through undersigned counsel, agree
23 and stipulate:

24 1. That Nevada Power Company has noticed the deposition of Mr.
25 Mansfield Neal, a General Electric Company official, notice attached
26 hereto and incorporated herein;

27 . . .

28 . . .

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1 2. ~~That Nevada Power Company has also noticed a Rule 30(b)(6)~~
2 ~~deposition of the General Electric Company official most~~
3 ~~knowledgeable regarding alleged destruction of evidence, notice~~
4 ~~attached hereto and incorporated herein;~~

5 3. ~~That the subject matter of Mr. Neal's proposed deposition~~
6 ~~and the Rule 30(b)(6) deposition mentioned above would at least~~
7 ~~substantially overlap;~~

8 4. That Mr. Neal is an attorney within General Electric's
9 office of General Counsel with supervisory responsibilities in this
10 case;

11 5. That General Electric has objected to the proposed
12 deposition of Mr. Neal, objections attached hereto and incorporated
13 herein;

14 6. That all parties wish to avoid subjecting Mr. Neal to a
15 deposition unless necessary;

16 7. However, the Court-set deadline for completion of fact
17 depositions is approaching quickly;

18 8. Therefore, the parties agree and stipulate that they will
19 confer on the need for Mr. Neal's deposition to be taken after
20 completion of the Rule 30(b)(6) deposition on the alleged destruction
21 of evidence referred to above, and will resolve that issue through
22 later agreement or through a motion to the Court;

23 9. Furthermore, the parties agree and stipulate that, in the
24 event plaintiff elects to re-notice Mr. Neal's deposition, plaintiff
25 will provide General Electric with at least five days advance notice
26 of the deposition, to enable General Electric, if necessary and
27 appropriate, to call the matter to the Court's attention in writing.

28 10. Furthermore, the parties agree and stipulate that should

1 the parties ultimately agree or the Court order that Mr. Neal's
2 deposition should be taken, that said deposition should proceed
3 despite the expiration of the Court-set deadline for completion of
4 fact witness depositions.

5 DATED: July __, 1993

BRADLEY & MERRELL
RALPH A. BRADLEY
PAUL E. MERRELL

8 By:

PAUL E. MERRELL
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Attorneys for Plaintiff
NEVADA POWER COMPANY, a Nevada
corporation

15 DATED: July __, 1993

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18 By:

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Attorneys for Defendants
MONSANTO COMPANY and
WESTINGHOUSE ELECTRIC CORPORATION

24 . . .
25 . . .
26 . . .
27 . . .
28 . . .

1 DATED: July __, 1993

ALVERSON, TAYLOR, MORTENSEN
& NELSON

By:

J. BRUCE ALVERSON
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(702) 384-7000

Attorneys for Defendant
GENERAL ELECTRIC COMPANY

IT IS SO ORDERED.

Magistrate Judge
United States District Court

DATED: _____

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7 July, 1993

VIA TELEFAX

John H. Tatlock, Esq.
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Denver, Colorado 80202

Re: Nevada Power Company v. Monsanto Company, et al.
USDC, District of Nevada Case CV-S-89-555-LDG (LRL)

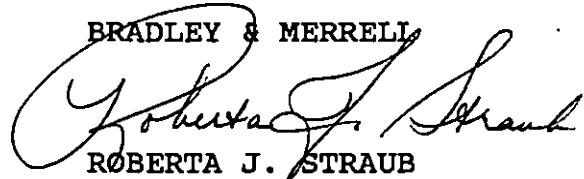
Dear John:

This is to let you know that we sent a box of documents to you this afternoon which contained the documents referenced in our contention responses. The box should arrive in Denver tomorrow afternoon via Federal Express.

Exhibits in that box are: 2523 - 2533, 2585 - 2732.
Exhibit numbers 1959 - 2422 and 2534 - 2584 are reserved numbers.

Sincerely,

BRADLEY & MERRELL



ROBERTA J. STRAUB

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