

**BRADLEY & MERRELL  
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**MESSAGE FROM XEROX 7024: (702) 385-1655**

**DATE:** 7-30-93

**TO:** John H. Kim, Esq.

**FAX #:** (713) 654-5070

**PHONE #:** (713) 654-4433

**FROM:** Paul E. Merrell

**CLIENT/MATTER:** Nevada Power v. Monsanto

**CLIENT/MATTER NO.:** 11927.2

**DOCUMENT(S) DESCRIPTION:** *Corresp. re scheduling WEC depositions.*

**NUMBER OF PAGES (including cover page):** -3-

**MESSAGE:**

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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 30, 1993

**VIA FACSIMILE**

John H. Kim  
Fisher, Gallagher & Lewis, LLP.  
1000 Louisiana, 70th Floor  
Houston, Texas 77002

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

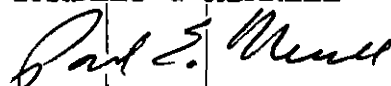
Dear John:

Attached please find a draft of a letter to Konrad Cailteux regarding the scheduling of next week's depositions of Westinghouse people in Pittsburgh. This letter should go out today if you plan on getting notices out and scheduling details taken care of in a timely fashion. Although Konrad was fairly accommodating during the last round of depositions, negotiations with him may delay the noticing aspect of this process by a few days.

The court has expressly ordered that we be allowed to take Bair personally after the completion of the 30 (b)(6) deposition.

Sincerely,

BRADLEY & MERRELL



PAUL E. MERRELL

PEM:hcd

Attachment

cc: Charles H. McCrea  
Richard L. Hinckley

# DRAFT

July 30, 1993

## VIA FACSIMILE

Konrad L. Cailteux  
Weil, Gotshal & Manges  
767 Fifth Avenue  
New York, New York 10153

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

Dear Mr. Cailteux:

Nevada Power would like to complete the depositions of the previously noticed Westinghouse document destruction witnesses on Thursday and Friday of next week. I propose the following order in which they will be scheduled in Pittsburgh, Pennsylvania:

|                                                                      |                              |
|----------------------------------------------------------------------|------------------------------|
| 30 (b)(6) re document<br>destruction (continued)                     | August 5, 1993<br>9:00 a.m.  |
| Carolyn MacFarland                                                   | August 5, 1993<br>11:00 a.m. |
| Ron Lawrence                                                         | August 5, 1993<br>2:00 p.m.  |
| Raymond Paschke                                                      | August 6, 1993<br>9:00 a.m.  |
| C.W. Bickerstaff (30 (b)(6)<br>& personal, continued)                | August 6, 1993<br>11:00 a.m. |
| Jeffrey Bair (30 (b)(6)<br>continued; end with<br>personal capacity) | August 6, 1993<br>2:00 p.m.  |

Please advise if these people are available on these dates, and we will proceed to schedule the court reporter and location. If Jeffrey Bair is not available to continue his deposition in Pittsburgh, please indicate on which date during the following week he will be available in South Carolina.

Konrad L. Cailteux  
July 30, 1993  
Page 2

Once these depositions have been completed, we will proceed to schedule the remaining Westinghouse 30 (b)(6) witnesses, Roger Wills and Robert Don McClain.

Since I will be handling the depositions in this case from here on in, please contact me directly to discuss all scheduling and related matters.

Sincerely,

FISHER, GALLAGHER & LEWIS, L.L.P.

JOHN H. KIM