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July 23, 1993

Sue Fogelboch
6226 West Sahara Ave.
Las Vegas NV 89102

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

Dear Sue,

Attached are copies of two deposition notices from Monsanto for Nevada Power's person most knowledgeable on 1) representations from Monsanto to Nevada Power and 2) Nevada Power's property damages. I realize that it will not be easy to find people with knowledge on these topics, but do your best and keep me updated as questions arise. We plan to appeal a court's recent ruling that these depositions go forward.

Monsanto is attempting to show that Nevada Power never relied on any representations by Monsanto based on the fact that there were no direct communications between them. Nevada Power's position is that it relied on information from Westinghouse, GE, and other third parties who received information from Monsanto.

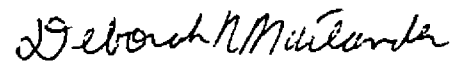
Regarding the property damage, Monsanto intends to argue that Nevada Power cannot recover any damages because it has not incurred damages to "other" (ie non-PCB equipment) property. Therefore, we need to emphasize damage to property such as buildings, cars, telephone polls, etc... for which Nevada Power incurred damages. This may also include damages to private property for which Nevada Power had to pay clean-up or replacement costs.

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We do not know when these depositions will go forward. They could be as early as the week of August 2nd.

Sincerely,

BRADLEY & MERRELL

A handwritten signature in cursive script, appearing to read "Deborah N. Mailander".

DEBORAH N. MAILANDER

DNM:bms