

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 15, 1993

VIA TELEFAX

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

Peggy A. Leen, Esq.  
Thorndal, Backus, Maupin & Armstrong  
Post Office Drawer 2070  
Las Vegas, Nevada 89125-2070

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

Dear Konrad and Peggy:

Regarding our Stipulations entered with the Court yesterday, I would appreciate it if you could dispatch by Federal Express today the materials called for in Section 1F, so that we can review these materials and forward them to Pittsburgh in time for the depositions.

Regarding Section 1C, we would regard that portion and the relevant discovery request categories satisfied if Westinghouse produces all job descriptions, anything specifically mentioning document retention/destruction tasks or responsibilities, and any commendations or reprimands. As to the reprimands, we are only interested in receiving them if they pertain to document retention/destruction issues.

I would also appreciate it if you might identify for us any documents that are responsive to discovery requests regarding the Exhibit 1212 and the 1986 company-wide sweep issues that we have received from Westinghouse in the last two weeks.

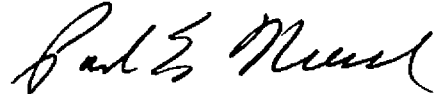
Finally, please note that we have an outstanding discovery request for any and all documents reviewed by deponents in preparation for their depositions. Please arrange to have any such documents brought with the deponents to their depositions.

Konrad L. Cailteux, Esq.  
Peggy A. Leen, Esq.  
July 15, 1993  
Page 2

Again, I appreciate your cooperation in dealing with what is obviously a very difficult issue for your client and which is extremely to both Nevada Power and Westinghouse. My remarks to Judge Leavitt yesterday in that regard were sincere and heartfelt. I am sure that this is one of the more difficult issues that any of us have had to deal with. Your professional treatment of the problem has not gone unnoticed.

Sincerely,

BRADLEY & MERRELL

A handwritten signature in cursive script, appearing to read "Paul E. Merrell".

PAUL E. MERRELL

PEM:dd  
cc: David E. Schalk, Esq.

BRADLEY & MERRELL  
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Seventh Floor — Bank of America Plaza  
300 South Fourth Street  
Las Vegas, Nevada 89101-6026  
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1855

DATE: 7/15/93

TO: Peggy A. Leen, Esq.

FAX #: (702) 366-0327

PHONE #: (702) 366-0622

FROM:

Paul Merrell

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

CLIENT/MATTER NO.: 11827.2

DOCUMENT(S) DESCRIPTION: letter

NUMBER OF PAGES (including cover page): 3

MESSAGE:

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| No. | REMOTE STATION | START TIME      | DURATION | #PAGES | MODE | RESULTS           |
|-----|----------------|-----------------|----------|--------|------|-------------------|
| 1   | PEGGY LEEN     | 7-15-83 12:47PM | 1'18"    | 3/ 3   | EC   | COMPLETED<br>9600 |

TOTAL 0:01'18" 3

#### 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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(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7/15/93

TO: Konrad L. Caliteaux, Esq.

FAX #: (212) 310-8516

PHONE #: (212) 310-8904

FROM: Paul Merrell

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

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## TRANSMISSION REPORT

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| 1   | 2123108516     | 7-15-83 12:49PM | 1'35"    | 4/ 4   | EC   | COMPLETED<br>9600 |

TOTAL 0:01'35" 4

#### NOTE:

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

**DATE:** 7/15/93

**TO:** David Schalk, Esq. **FAX #:** 203/378-4958  
**PHONE #:**

**FROM:** Paul Merrell

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

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please call (702) 385-4202 and ask for: ~~Robert Osterloh~~, Ext. 615

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