

ALVERSON, TAYLOR, MORTENSEN & GOULD

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December 4, 1989

J. Randall Jones, Esq.
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300 South Fourth Street, 7th Floor
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HAND DELIVERED

Thomas E. Kotoske, Esq.
540 University Ave., Third Floor
Palo Alto, California 94301
VIA: FEDERAL EXPRESS

Re: General Electric, et al. adv. Nevada Power
Our File No.: 5025

Gentlemen:

In response to your correspondence dated November 21, 1989 concerning certain discovery propounded upon the Defendant General Electric Company in this matter, please accept the following.

This correspondence shall explain the responses provided by General Electric Company which were referenced in your letter. General Electric disagrees with the assertions in your correspondence, but this letter will confine itself to the discovery responses.

Since your discovery request and subsequent correspondence refuses to indicate where you obtained these documents, General Electric must, of necessity, rely on the documents themselves in order to ascertain whether or not each document is genuine. For example, documents 48-58 can now be admitted after additional investigation has been done by General Electric. The brochure entitled "Pyranol Transformers" appears similar to a document published by General Electric in 1942. Without any assistance as to where the document was obtained, a search as to the authenticity of the document

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nearly 50 years old is an extremely time-consuming process. Nevertheless, the copy of that document provided by Nevada Power is not complete; therefore, General Electric will supplement its response to the Request to Admit by admitting that the entire document, which will be attached, as kept in its files is genuine.

Your correspondence also objects to our responses concerning documents 1-14, 62-72, 80-86, and 106-107. Each of these sets of documents will be discussed in turn.

Documents 1-14 are material safety data sheets, but the documents themselves do not indicate any individual who authored them. All versions of these sheets are not kept by General Electric since changes or updates are often made. After a diligent search, the sheets attached in your discovery requests could not be located. Therefore, General Electric is not prepared to admit their authenticity without any identification as to any individual who would be able to indicate whether or not they are genuine.

The correspondence referenced in documents 62-72 were authored by an individual who has retired several years ago from General Electric. Therefore, General Electric cannot authenticate these documents.

Concerning documents 80-86, no author is listed on this report; therefore, General Electric is not prepared to admit authenticity.

The documents on pages 106-107, based on General Electric's best information, came from an EPA publication. Thus, General Electric is unable to authenticate this document at this time.

With regards to the Answer to Interrogatory Number 2, your Interrogatory requests identification of a person most knowledgeable concerning how the documents were maintained and retrieved from General Electric's records. As discussed previously, these documents were not retrieved from General Electric's records in this litigation since these documents originated in this litigation in your discovery requests. Therefore, your

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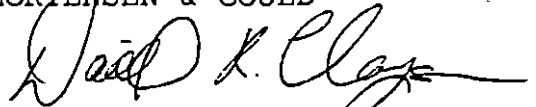
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request to identify the person who retrieved these documents is without any basis.

Very truly yours,

ALVERSON, TAYLOR,
MORTENSEN & GOULD

A handwritten signature in dark ink, appearing to read "David R. Clayson", with a long horizontal flourish extending to the right.

David R. Clayson, Esq.

DRC:deb

cc: Bruce Featherstone, Esq.
Mansfield Neal, Esq.
Neil Peck, Esq.
John L. Thorndal, Esq.