

SENT BY:

7-30-93 : 9:44AM : BRADLEY AND MERRELL-

607 770 8623: # 1/ 5

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

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 30, 1993FROM: Dr. Arnold Schechter

FAX #: (607) 770-8623

TO: Robert Straub

PHONE #: (607) 770-8521

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION:

Draft witness disclosureNUMBER OF PAGES (including cover page): 5

MESSAGE:

THIS TELECOPY IS INTENDED ONLY FOR THE ADDRESSEE NAMED ABOVE. IT MAY CONTAIN INFORMATION THAT IS PRIVILEGED AND CONFIDENTIAL. IF YOU HAVE RECEIVED THE TELECOPY IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, DESTROY ALL COPIES, AND DO NOT DISSEMINATE THE INFORMATION TO ANYONE. THANK YOU FOR YOUR ASSISTANCE.

IF YOU EXPERIENCE PROBLEMS WITH THIS TRANSMISSION,
please call (702) 385-4202 and ask for: Robert Osterloh, Ext. 615

2nd
DRAFT

Nevada Power Company v. Monsanto Co., et al.
Case No. CV-S-89-555-LDG-LRL

PRETRIAL WITNESS STATEMENT

Dr. Arnold Schechter
88 Aldridge Avenue
Binghamton, New York 13903

SUMMARY OF TESTIMONY

Dr. Schechter is a senior medical and scientific authority on many aspects of, including but not limited to public health and medical aspects of PCB residues including ^{the} closely related PCDD and PCDF residues in human tissues in industrialized as well as less industrialized nations. Dr. Schechter has devoted over 10 years' time to the study of PCBs, PCDDs and PCDFs with patients. Dr. Schechter has been an advisor/consultant ^{or peer reviewed} to the World Health Organization (WHO), U.S. Environmental Protection Agency (EPA), and the Agency for Toxic Diseases and Substance Registry ^{of} for the Centers for Disease Control (CDC). ^{with respect to these chemicals} In addition, Dr. Schechter conducts ongoing research in the United States, Russia, China, Vietnam, and Japan on PCBs, PCDDs and PCDFs. As a county Health Commissioner, Dr. Schechter was the first to point out the dangers of PCBs, PCDDs and PCDFs in PCB transformer fires.

Dr. Schechter received a B.A. in Liberal Arts and a B.S. in Physiology and Neurophysiology from the University of Chicago, his M.D. from Howard University Medical School, and his M.P.H. from Columbia University School of Public Health. Dr. Schechter's post-

graduate training has included ^{a several week} "mini-residency" in Occupational Medicine at the University of Cincinnati College of Medicine and in ^{Training} Occupational Medicine at the University of Illinois Medical School in Chicago, Illinois ^{and} at Mt. Sinai Medical Center in New York and at New York University Medical Center and various courses at Occupational Medical national meetings.

Currently, and for the past ¹³ ~~three~~ years, Dr. Schacter ^{has been} is a professor at the Department of Preventive Medicine, ^{State University of} (SUNY) Health ^{New York} Science Center in Syracuse, New York ^{at the} and in the Clinical Campus at Binghamton, New York. Previously he trained and served on the faculties of Harvard Medical School, SUNY Downstate Medical School and the New Jersey Medical School. He is also a staff member at Our Lady of Lourdes Hospital in Binghamton, New York and the United Health Services Hospitals in Binghamton and Johnson City, New York.

As an extensively published author on PCBs, PCDDs and PCDFs, Dr. Schacter's expertise is relied upon by many persons researching the issues surrounding these chemicals.

Some of Dr. Schacter's membership affiliations are: the ^{the American Public Health Association} Association of Teachers of Preventive Medicine; the American College of Epidemiology; he is a Fellow in the American College of Occupational and Environmental Medicine; a Fellow in the American College of Preventive Medicine; a Fellow in the American College of Physicians; a member of the American Association for the Advancement of Science; and a member of the Society for Epidemiologic Research and belongs to other other scientific and professional organizations.

In this litigation, Dr. Schacter is presented as an expert on

the toxicology of PCBs, dioxins and dibenzofurans (PCB related compounds). In the last eleven years, Dr. Schechter's research has focused on PCB, PCDD and PCDF residues found in patients' bodies and movement of the PCBs, PCDDs and PCDFs through the human body;

~~points of collection within the human body for PCBs, PCDDs and PCDFs; the biological half-lives of PCBs, PCDDs and PCDFs; and the movement of PCBs, PCDDs and PCDFs through the placenta and to the fetus.~~

and in the environment
rate of elimination

Dr. Schechter's research has also focused on the background exposures of human populations to PCBs, PCDDs and PCDFs as well as the bioaccumulation of PCBs, PCDDs and PCDFs in the general human population. Dr. Schechter will testify to the impact of additional PCBs, PCDDs and PCDFs when added to the background levels already present in the human population.

Dr. Schechter is of the opinion that PCBs, PCDDs and PCDFs are inherently dangerous to laboratory animals, wildlife and humans. He is also of the opinion that levels of PCBs, PCDDs and PCDFs must be reduced to lower the existing background human body burdens. Dr. Schechter will also testify that the PCB equipment at Nevada Power which is above and below the existing EPA standards is defectively hazardous because of toxicity, persistence and bioaccumulation.

The basis for Dr. Schechter's testimony will be his education, research experience, ^{public health and medical experience, and} training and understanding of the current literature on PCBs, PCDDs and PCDFs. Dr. Schechter will also review publications from his published research as well as other research and reports generated by research on PCBs, PCDDs and PCDFs.

Among the more general sources of Dr. Schechter's information will be general scientific literature on PCBs, PCDDs and PCDFs along with recent NIOSH, EPA, CDC, Air Force and other government agency research. Dr. Schechter may review materials covered at scientific meetings and information covered with or discussed with other experts. Another category of information upon which Dr. Schechter may rely includes pertinent research provided by state agencies and symposia and other publications dealing with halogenated aromatic hydrocarbon toxicity. *National Academy of Sciences*
federal or

At the request of Nevada Power attorneys, Dr. Schechter may also review learned treatises of other experts or any other documents related to the case which Nevada Power attorneys provide for his review.

Finally, Dr. Schechter may also be called upon to explain and define any scientific terms used by the defendants in documents gathered by Nevada Power during discovery and presented to him.