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July 19, 1993

VIA TELECOPIER

Paul E. Merrell, Esq.
Bradley & Merrell
c/o Jones, Jones, Close
& Brown, Chartered
700 Bank of America Plaza
300 South Fourth Street, Suite 700
Las Vegas, Nevada 89101-6026

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

Dear Paul:

In regard to your request for the exhibits to Mr. Bickerstaff's deposition testimony, the vast majority of the exhibits have nothing whatsoever to do with PCBs, and consequently are not relevant to this proceeding. However, if you have particular documents you are interested in and can articulate their relevance to this litigation, Westinghouse will consider your request.

Those documents that do refer to PCBs in Bickerstaff's depositions have already been produced to you, as well as all of the documents relating to the circumstances surrounding the preparation of Plaintiff's Exhibit 1212.

As for your request that Mr. Bickerstaff review his prior depositions and be prepared to verify them under oath at his deposition, Westinghouse objects to your request. Those depositions were taken in non-PCB litigations. Moreover, at least as to Mr. Bickerstaff's July 9, 1993 deposition, his time to review and correct the transcript under the Federal Rules of

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Paul E. Merrell, Esq.
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Civil Procedure has not even run yet. However, Westinghouse will provide copies of the signature pages, if they exist, from the Insurance Litigation deposition, and will also provide a copy of the signature page from the July 9, 1993 deposition if and when it is prepared.

As to the copies of the dioxin/furan documents mentioned in Plaintiff's Exhibit 1212 that you asked Westinghouse to search for, Westinghouse will produce copies of those documents during the depositions scheduled to begin on Tuesday, July 20, 1993.

Very truly yours,



Konrad L. Cailteux

KLC:ap
cc: Arvin Maskin, Esq.

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PLEASE SEND:

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DATE: July 19, 1993 PREPARED BY: A. Pavenick

CLIENT/MATTER NAME:
CLIENT/MATTER NUMBER:

80758-0100
Westinghouse Nevada Power

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