

LAW OFFICES

JONES, JONES, CLOSE & BROWN
CHARTERED

A PROFESSIONAL CORPORATION

SEVENTH FLOOR - VALLEY BANK PLAZA

300 SOUTH FOURTH STREET

LAS VEGAS, NEVADA 89101-6020

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OF COUNSEL
LYLE RIVERA
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367-5169
(FAX)

VIA FASC

Gene Mat
Richard :
NEVADA P:
6266 W. :
Las Vega:

Re: Nevada Power v. Monsanto et al.

Gentlemen:

Accompanying this letter is a copy of the Notice of Depositions for various parties. As you can see, Don is set to go first with other past and present officers of Nevada Power scheduled for later.

In order to prepare for these depositions, Mr. Kotoske has suggested that we get everyone who will be deposed together in one room and have Mr. Kotoske prepare them. The proposed date of this is November 20, 1989 at 1:00 o'clock p.m. at our offices. In addition to the preparation, Mr. Kotoske will defend the first three to four days of the depositions, with members of this office defending the rest.

In reference to the foregoing depositions, a few other matters need to be attended to. The first matter is getting the addresses of the retired members of Nevada Power scheduled to be deposed. I will need to get these from Nevada Power's Payroll Department.

RENO OFFICE: 1 EAST LIBERTY, SUITE 614 • RENO, NEVADA 89501-2110
TELEPHONE (702) 348-0880 TELECOPIER (702) 786-1354

RENO BANKRUPTCY DEPARTMENT: 290 SOUTH ARLINGTON, SUITE 100 • RENO, NEVADA 89501
TELEPHONE (702) 322-3811 TELECOPIER (702) 322-3649

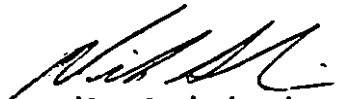
Gene Matteucci
Richard Hinckley
NEVADA POWER COMPANY
November 16, 1989
Page 2

Additionally, I would like to know how the search of the remaining corporation minutes and books for PCB related material is proceeding. We promised the Defendants to conduct such a search and I would like to comply as soon as possible. I have already sent the responses to Richard's memo from the various Nevada Power departments to our opponents.

This sums up the matters to date. I greatly appreciate both of your assistance in this matter. Once these depositions are completed, the worst part of the storm is over for us. As you know already, subsequent to completion of discovery, we will file briefs on the Statute of Limitations issues.

Sincerely yours,

JONES, JONES, CLOSE
& BROWN, CHARTERED

A handwritten signature in dark ink, appearing to read 'Nik Skrinjaric', is written over the typed name.

Nik Skrinjaric, Esq.

NS/sar/0631U
Enclosures

1 JOHN L. THORNDAL, ESQ.
2 PEGGY A. LEEN, ESQ.
3 THORNDAL, BACKUS, MAUPIN
& ARMSTRONG
4 1100 East Bridger Avenue
P.O. Drawer 2070
6 Las Vegas, NV 89125-2070
7 Telephone: (702) 366-0622

8 JEFFREY S. KLEIN, ESQ.
9 WEIL, GOTSHAL & MANGES
767 Fifth Avenue
New York, NY 10153
Telephone: (212) 310-8790

Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

14 NEVADA POWER COMPANY, a Nevada)
Corporation,)
15 Plaintiff,)
16 v.)
MONSANTO COMPANY, a foreign corpor-)
17 ation; GENERAL ELECTRIC COMPANY, a)
foreign corporation; WESTINGHOUSE)
18 ELECTRIC CORPORATION, a foreign)
corporation; and DOES I through)
19 XXV, inclusive,)
Defendants.)

CV-S-89-555-LDG-LRL

NOTICE TO TAKE
DEPOSITIONS

21 PLEASE TAKE NOTICE that the attorneys for the defendants
22 will take the following depositions at the offices of THORNDAL,
23 BACKUS, MAUPIN & ARMSTRONG, a Professional Corporation, 1100
24 East Bridger Avenue, Las Vegas, Nevada, on the dates and at the
25 times indicated below, upon oral examination, pursuant to Rule
26 26 of the Federal Rules of Civil Procedure, before a notary

27 / / /

28 / / /

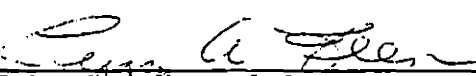
1 public, or before some other officer authorized by law to
2 administer oaths. You are invited to attend and cross-examine.

3	Donald Fabbi	November 27, 1989	1:15 p.m.
4	Donald Fabbi	November 28, 1989	9:00 a.m.
5	Donald Fabbi	November 29, 1989	9:00 a.m.
6	John McCarthy	November 30, 1989	9:00 a.m., or upon 7 completion of deposition of Donald Fabbi
8	John McCarthy	December 1, 1989	9:00 a.m.
9	Mark Reddaway	December 4, 1989	10:00 a.m.
10	Arthur Pearson	December 5, 1989	9:00 a.m.
11	Don Crotta	December 6, 1989	9:00 a.m.
12	Conrad Ryan	December 7, 1989	9:00 a.m.
13	Keith Grant	December 8, 1989	9:00 a.m.

14
15 Oral examination will continue from day to day until completed.

16 JEFFREY S. KLEIN, ESQ.
17 WEIL, GOTSHAL & MANGES

18 THORNDAL, BACKUS, MAUPIN
& ARMSTRONG

19 BY: 
20 John D. Thorndal
21 Peggy A. Leen
22 1100 East Bridger Avenue
23 P.O. Drawer 2070
24 Las Vegas, NV 89125-2070
25 Attorneys for WESTINGHOUSE
26
27
28

1 RECEIPT OF A COPY of the foregoing NOTICE TO TAKE DEPOSI-
2 TIONS is hereby acknowledged this 6th day of November, 1989.

3 JONES, JONES, CLOSE
4 & BROWN

J. Randall Jones *lp*

5 BY

J. Randall Jones
Charles H. McCrea
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Attorneys for Plaintiff

ALVERSON, TAYLOR
& MORTENSEN

6 BY

J. Bruce Alverson *lp*
600 South Eighth Street
Las Vegas, NV 89101
Attorneys for GENERAL
ELECTRIC & MONSANTO

9 AFFIDAVIT OF MAILING

10 STATE OF NEVADA)
11) SS.
12 COUNTY OF CLARK)

13 ANN DAANE, being first duly sworn, deposes and says:

14 That affiant is, and was when the herein described mailing
15 took place, a citizen of the United States, of such age and
16 discretion as to be competent to serve papers, not a party to,
17 nor interested in, the within action, and that on November
18 6, 1989, affiant mailed a true and correct copy of the
19 foregoing NOTICE TO TAKE DEPOSITIONS addressed as follows:

20 Bruce A. Featherstone, Esq.
21 John Tatlock, Esq.
22 KIRKLAND & ELLIS
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Monsanto

Thomas E. Kotoske, Esq.
540 University Avenue
Third Floor
Palo Alto, CA 94301
Attorney for Plaintiff

Ann Daane
ANN DAANE

24 SUBSCRIBED AND SWORN to before me
25 this 6th day of November, 1989.

26 *Janet M. Kruse*
27 NOTARY PUBLIC



JANET M. KRUSE
Notary Public - State of Nevada
CLARK COUNTY
My Commission Expires July 27, 1992