

MEMORANDUM

TO: NEVPOWER FILE [FILEMEMO.3]
FROM: CHM
RE: TELCON WITH BILL SNYDER
DATE: May 4, 1992

Paul Merrell needs Nevada District Court local rules on summary judgment; I have faxed the rule to him.

Bill spoke with Wilford Lyons, CEO of Independent Life. Lyons' brother and an in-house attorney - Guy Marvin - handled the case for Independent. Marvin was not in but will call Bill back and give him the names of the GE personnel who negotiated the settlement meetings at Sea Island, GA. Bill estimates that Independent's specials in its case against GE were \$1.5 - \$2M, a lot of it represented by disposal costs. There were about 15 PCB transformers involved, all GE.

I spoke also with Randall and Paul this morning. Paul is preparing a motion for partial summary judgment (for which he needed the local court rules). Discussions with them produced no usable lead-in for opening conversations with GE. The remark (made by Dave Clayson to Nik, I confirmed after talking with Paul and Nik) to the effect that if Nevada Power wins its appeal, "we'll be at your door with wheelbarrows full of money" isn't usable given the context in which it occurred.

Current strategy is to try to set up meeting with GE alone on the 20th or 21st of May at the Desert Inn; give GE copies of what we intend to file as well as our demand letter; meet with them the

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following day to ascertain their reaction. I need to set things in motion on these meetings; call Alverson tomorrow after viewing Randall's draft of the demand letter.

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