EXHIBIT #1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CECIL SCOTT, et al Plaintiffs V. MONSANTO COMPANY Defendant	C. A. NO. B-84-1103-CA

PLAINTIFFS' NOTICE OF INTENTION
TO TAKE VIDEOTAPED ORAL DEPOSITION
AND SUBPOENA DUCES TECUM

TO: Defendant, MONSANTO COMPANY, by and through its counsel of record, Mr. Jonathan B. Shoebotham and Mr. Robert A. Hall, Woodard, Hall & Primm, 4700 Texas Commerce Tower, Houston, Texas 77002

Mr. Walter J. Crawford, Jr., Wells, Peyton, Beard, Greenberg, Hunt & Crawford, 624 Petroleum Bldg., P. O. Box 3708, Beaumont, Texas 77704

Mr. John M. Johnson, Mr. Warren B. Lightfoot, Bradley, Arant, Rose & White, 1400 Park Place Tower, Birmingham, Alabama 35203

Mr. Michael R. Fruewald, Mr. Michael Rosiello, Ms. Anne C. McGown, Barnes & Thornburg, 1313 Merchants Bank Bldg. 11 South Meridian Street, Indianapolis, Indiana 46204

Pursuant to the provisions of Rule 30(b)(6) of the Federal Rules of Civil Procedure, the Plaintiffs in this cause hereby give notice to the Defendant that the videotaped oral deposition of the representative(s) of Monsanto Company will be taken on the date and time and at the place hereinafter stated. Specifically, the Plaintiffs intend to take the videotaped oral deposition of the

Shirley + Bishop Ex #1
NKL 6-29-87

HARTOLDMON0020104

representative(s) designated by Defendant pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and charged with the responsibility for maintaining custody of the documents listed below and such designated representative(s) shall testify as to matters known or reasonably available to the Defendant as well as the custody of the herein designated records and their maintenance by Defendant:

I. Public Relations

a. The person most knowledgeable about the management and/or direction of Monsanto's public relations department during the 1970's; and,

b. The person most knowledgeable about any and all press releases involving Dr. Parvis Pour, the work of Dr. Renata Kimbrough, IBT and the environmental or human health effects of PCBs.

II. Personnel Department

a. The person most knowledgeable about the management and/or direction of Monsanto's personnel department during the 1970's;

b. The person most knowledgeable about the raises, promotions and merit awards of Dr. Paul L. Wright; and,

c. The person most knowledgeable about any and all documents prepared and executed in connection with the termination of the employment of Dr. Paul L. Wright.

The deposition will be taken at the offices of Bruntrager, Bruntrager & Billings, 1015 Locust, Suite 1140, St. Louis, Missouri 63101 beginning at 9:00 a.m. on Monday, June 29, 1987, and shall continue until completed.

00002
HARTOLDMON0020105

This oral deposition will be taken before a certified court reporter. The testimony given during this oral deposition will be used as evidence in this matter, together with the documents produced at this deposition. You are invited to attend and cross-examine.

Pursuant to Rules 30(b)(5) and 34 of the Federal Rules of Civil Procedure, certain documents shall be produced by the designated representative(s) or custodian(s) of Monsanto Company (referred to herein as "Monsanto") at the commencement of the oral deposition or prior thereto by agreement of counsel. The originals and all drafts of the requested documents named in Exhibit "A" shall be produced.

Unless otherwise specified herein, the documents to be produced include all documents in the possession of Monsanto from the date of the first production or manufacture of PCBs in any form by Monsanto to the present time.

As used in this notice, the term "documents" means any printed, typewritten or handwritten matter, or reproduction thereof, of whatever character, in the possession, custody or control of a witness or his agents, representatives or employees, including without limitation, correspondence, contracts, memoranda, agreements, letters, brochures, reports, handwritten or typewritten notes, sound recordings or transcriptions thereof, computer print-outs, inter-company and intra-company communications, work papers, diaries, calendar pads, appointment books, ledgers,

00003
HARTOLDMON0020106

financial statements, checks, bank drafts and writings of whatever kind and character, whether originals or reproductions, and whether in draft or final form, including copies bearing different markings or notations.

By: Michael A. Pohl
MICHAEL A. POHL

OF COUNSEL:

David M. Lacey
GILPIN, POHL & BENNETT
1300 Post Oak Blvd.
Allied Bank Tower, 23rd Floor
Houston, Texas 77056
(713) 623-8800

Joseph C. Blanks
READD, MORGAN & QUINN
909 Laurel Avenue
Beaumont, Texas 77701
(409) 838-9941

Thomas Henderson
HENDERSON & GOLDBERG
1030 Fifth Avenue
Pittsburgh, Pennsylvania 15219

Benton Musslewhite
LAW OFFICES OF BENTON MUSSLEWHITE
609 Fannin, Suite 517
Houston, Texas 77002
(713) 222-2288

David S. McCrea
McCREA & McCREA
119 S. Walnut Street
Bloomington, Indiana 47402
(812) 336-4840

ATTORNEYS FOR PLAINTIFFS,
CECIL SCOTT, ET AL.

HARTOLDMON0020107

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June, 1987, a duplicate original of the foregoing Plaintiffs' Notice of Intention to Take Oral Deposition was filed with the Clerk of the Court for the Eastern District of Texas, Beaumont Division. I also certify that a true and correct copy of this Notice was served upon counsel of record on the 25th day of June, 1987, by messenger delivery and/or by placing same in the United States mail, certified mail, return receipt requested, postage prepaid and addressed as follows:

Mr. Robert A. Hall
Mr. Jonathan B. Shoebotham
Woodard, Hall & Primm
4700 Texas Commerce Tower
Houston, Texas 77002

Mr. Walter J. Crawford, Jr.
Wells, Peyton, Beard, Greenberg,
Hunt & Crawford
P. O. Box 3708
Beaumont, Texas 77704

Mr. John M. Johnson
Mr. Warren B. Lightfoot
Bradley, Arant, Rose & White
1400 Park Place Tower
Birmingham, Alabama 35203

Mr. Michael R. Fruewald
Mr. Michael Rosiello
Ms. Anne C. McGown
Barnes & Thornburg
1313 Merchants Bank Bldg.
11 South Meridian Street
Indianapolis, Indiana 46204

Michael A. Pohl

MICHAEL A. POHL

MAP:jar/scottmon/054

00004

HARTOLDMON0020108

EXHIBIT "A"

SUBPOENA DUCES TECUM

1. All documents identified in the letter from Mike Pohl to Jon Shoebotham dated June 19, 1987;

2. A document stating the total amounts spent by Monsanto with IBT during each year that Monsanto utilized the services of IBT and, to the extent a separate breakout exists, the amount spent by Monsanto with IBT in connection with PCB related studies for each year that such studies were conducted;

3. Any manual, pamphlet, corporate policy document or memorandum of Monsanto stating or referring to Monsanto's standards from 1965 to date for the conducting of Monsanto or Monsanto sponsored toxicological studies;

4. Any investigative or background file pertaining to or referring to Dr. Renata Kimbrough, Dr. Parvis Pour, Dr. Ward Richter, Dr. Donovan Gordon and/or Dr. Paul L. Wright;

5. All correspondence to or from Dr. William Rivelin and any reports prepared by him which pertain to PCBs;

6. Any document pertaining to meetings between Monsanto and any employee or agency of the United States government in the fall of 1975 regarding PCBs including trip reports, correspondence to or from IBT, memorandums, hand-written notes, photographs, expense reimbursement requests, travel itineraries, etc.;

7. Any document pertaining to any trip by a Monsanto employee to Europe with any employee of IBT;

8. All Electrical Power Research Institute reports, articles, papers, etc. pertaining or relating to PCBs or excerpts therefrom which were shown or otherwise made available to Monsanto's expert witnesses; and,

9. Any correspondence by or between Monsanto and Nalco regarding Monsanto sponsored IBT Aroclor studies, PCBs, the employment of Dr. Paul L. Wright or changes or alterations in connection with any IBT Aroclor report or the backdating of any documents by IBT for or in collaboration with Monsanto.

MAP:jar/scottmon/087

HARTOLDMON0020109