

MEMORANDUM

TO: All members of the Nevada Power Plaintiff's Litigation Team
FROM: Barbara Banks *B. Banks*
RE: Impounded documents
DATE: July 26, 1993

This is to stress the importance of immediate compliance with a recent court order to impound certain documents in this office and to advise of the need to impound another document, which was the subject of a letter I sent you Friday. I have not heard back from you in that regard.

Please take the Court's order seriously. We are under order to impound immediately in this office all plaintiff's copies of the following documents: Monsanto document production Bates numbered NEV 034520, NEV 034724, NEV 035011-035016, NEV 040855-040863. Please confirm immediately that you: [i] have reviewed your files and determined that there are no copies of these documents therein; [ii] had copies but have destroyed them; or [iii] have shipped your copies of these documents to this office marked to my personal attention. If you found copies in your files, please also indicate the results of your investigation into whether any copies of them were released to third parties, and if so, detail your efforts to retrieve such copies.

We have also received a copy of a letter from counsel for Westinghouse to Judge Leavitt indicating that Westinghouse is requesting the Court's Order of July 20, 1993 regarding waiver of privilege claims by Westinghouse be sealed. I believe that this

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notice may create an obligation on our part to impound that Order as well, although it need not be in this office. If you are counsel of record, you should have received a copy of this order from the Court and should immediately remove it from your normal working file, collect all working copies, and either destroy them or impound them in a secure location and not disseminate them.

Please call Barbara Banks at this office if you have any questions on these matters.

j:\oev\bjb\adm\impound.001
July 26, 1993 1:04pm

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 26, 1993

TO: ALL PLAINTIFF Reps. FAX #:

PHONE #:

FROM: Barbara BANKS

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION:

NUMBER OF PAGES (including cover page): 3

MESSAGE:

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

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	HINCKLEY	7-26-93 1:31PM	1'06"	3/ 3	EC	COMPLETED 9600

TOTAL 0:01'06" 3

NOTE:

No. : OPERATION NUMBER 48 : 4800BPS SELECTED EC : ERROR CORRECT G2 : G2 COMMUNICATION
PD : POLLED BY REMOTE SF : STORE & FORWARD RI : RELAY INITIATE RS : RELAY STATION
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1	FOGLEBOCK	7-26-93 1:33PM	1'06"	3/ 3	EC	COMPLETED 9600

TOTAL 0:01'06" 3

NOTE:

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STORE & FORWARD REPORT

DATE/TIME
LOCAL TERMINAL ID.
LOCAL NAME
COMPANY LOGO

7-26-93 2:04PM
7023851655
BRADLEY AND MERRELL

No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
014	SNYDER	7-26-93 1:47PM	1'52"	3/ 3	SF	COMPLETED 9600
015	D. MCCREA	1:49PM	1'58"	3/ 3	SF	COMPLETED 9600
016	PAUL/CAROL	1:52PM	1'52"	3/ 3	SF	COMPLETED 9600
017	BRADLEY	1:54PM	1'09"	3/ 3	EC SF	COMPLETED 9600
019	GALLAGHER	2:01PM	1'12"	3/ 3	SF	COMPLETED 9600
020	KIM	2:02PM	1'34"	3/ 3	SF	COMPLETED 7200

TOTAL 0:09'37" 18

NOTE:

No. : DIRECTORY NUMBER	48 : 4800BPS SELECTED	EC : ERROR CORRECT	G2 : G2 COMMUNICATION
PD : POLLED BY REMOTE	SF : STORE & FORWARD	RI : RELAY INITIATE	RS : RELAY STATION
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