

MEMORANDUM

TO: FILE

FROM: CHARLES H. McCREA, 

RE: NEVADA POWER COMPANY v. MONSANTO COMPANY, et al.
INQUIRY FROM LAS VEGAS SUN REPORTER

DATE: JULY 11, 1989

Bill Gang, a reporter from the Las Vegas Sun, called Randall Jones this morning regarding this case. He asked for a copy of the Complaint (which we might as well give him; he can get one from the Courthouse) and also asked for copies of the documents which support the allegations in the Complaint.

Randall Jones, Nik Skrinjaric and I called Tom Kotoske and discussed the matter. As indicated in my covering letter (attached) transmitting a copy of the Complaint to Gene Matteucci, our objective is to keep this matter as low key as possible, but nevertheless try to maintain cordial relations with the media and not stonewall them. We must appreciate that there is wide public interest in environmental issues and toxic waste. These matters are therefore extraordinarily newsworthy and both Nevada Power and its counsel have much to gain from good media relations.

In our conference call with Tom Kotoske, we agreed to the following course:

1. The client's interest in an early resolution of the case must be our first consideration.

2. All media inquiries should be handled by counsel. [I have just spoken with Charles A. Lenzie, President and CEO, who assured me that Nevada Power will refer all media inquiries to me.]

3. When approached by the media, we will inform them of the following:

(i) We have great confidence in our ability to support the allegations appearing in our Complaint; we would not have made these allegations if we could not support them.

(ii) We are members of a multi-state team of lawyers knowledgeable about PCBs and experienced in this type of litigation.

(iii) We have at our disposal a library of more than 25,000 documents relating to PCB problems and the involvement of the defendants with PCBs.

(iv) These documents form the core of our case and will be presented at the proper time, either in evidence at trial or in connection with pre-trial activity, as the occasion demands.

(v) It would be inappropriate and possibly detrimental to the interest of Nevada Power to release these documents now.

Attachment

cc: w/attachment: Thomas E. Kotoske, Esq.
David S. McCrea, Esq.
J. Randall Jones, Esq.
Nik Skrinjaric, Esq.

0876H