

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

COPY

NEVADA POWER COMPANY, etc.,)
Plaintiff,)

vs.)

MONSANTO COMPANY, etc.,)
et al,)

Defendants.)

Case No.
CV-S-89-555-LDG
(LRL)

Deposition of: RICHARD J. BIERNACKI,
taken before Bethany A. Carrier, Court Reporter and
Notary Public within and for the State of
Connecticut, pursuant to Notice and the Federal
Rules of Civil Procedure, at the Marriott, 180
Hawley Lane, Trumbull, Connecticut, on July 15,
1993, at 11:10 a.m.

Bethany A. Carrier
Brandon Reporting Service
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Brandon Reporting Service

1 Q How much of that time was spent reviewing the
2 documents you referred to?

3 A Probably 50 percent.

4 Q And were the instruction books and engineering
5 notice, the nameplate drawings, the Nevada Power
6 requisition folder the only documents you reviewed?

7 A There was also a file involving some
8 investigation made into a number of Nevada Power
9 transformers.

10 Q Why were they investigated?

11 A We had a request from our division counsel to
12 review a number of Nevada Power transformers to
13 determine how many contained PCBs.

14 Q What was the date of that?

15 A This was in '89. 1989.

16 MR. SCHALK: Counsel, has that been
17 produced to us?

18 MR. SHAUGHNESSY: That has not yet been
19 produced. We don't have it with us, but we will produce
20 that as soon as we get back.

21 BY MR. SCHALK:

22 Q Were there any other documents that you
23 reviewed?

24 A I recall reading a -- I believe two documents
25 that would have been sent out from -- as information