

MEMORANDUM

TO: Nevada Power v. Monsanto File
FROM: J. Randall Jones
RE: Telephone Call with Attorney Steve Simons
DATE: August 15, 1989

Today I spoke with Phoenix attorney, Steve Simons, (602) 951-1536. Apparently one of his clients who owns a resort in Phoenix saw the article in the paper in Las Vegas about our Nevada Power case. That client owns a resort which has PCB laced capacitors made by Westinghouse.

Pursuant to the EPA's directive, they are in the process of changing out all of the Westinghouse PCB contaminated capacitors, at a cost of approximately \$270,000. He said there are approximately 23-24 of these capacitors and transformers.

His client wanted to know if there was anything we could do for them, if they could join in our suit and if so, how to go about it. I gave him the bare outline of our allegations and the problems arising out of the recent Sixth Circuit decision dismissing a similar claim against the same three defendants we sued. I went on to say it would seem that his client would not be susceptible to the same defense since it was a private company, which probably had no knowledge of PCB related problems in transformer and capacitors.

He is going to write me a letter asking for information and setting forth his client's position and I told him I would respond as soon as I could tell him something concrete.



J. RANDALL JONES

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