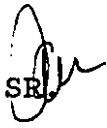


MEMORANDUM

TO: NIK SKRINJARIC

FROM: CHARLES H. McCREA, SR. 

RE: NEVADA POWER COMPANY V. MONSANTO, ET AL.
FILE NO. 11927.2

DATE: JUNE 15, 1989

Tom Kotoske called. He said that GE, Westinghouse and Monsanto will hold a meeting next week about the Nevada Power case. Tom expects to hear from GE's counsel, Manny Neal, soon after the meeting. He has managed to maintain a direct line of communications with Neal rather than work through GE's local counsel (Thorndal, Backus, Maupin & Armstrong). Tom has enough cases against GE that Neal has concluded it will save time, money and aggravation by dealing directly.

Tom has received an offer of settlement in the IU case which he believes the University will accept. He thinks it is a weaker case than Nevada Power's because the University has not yet made the change-outs, needs the money to do so and is under the gun to comply with Federal law by seeing to it that the change-outs are completed by October 1989.

Tom asked me if we could revise our draft of the Complaint in accordance with the memorandum enclosed with his letter of June 6th and have a clean draft back to him by Monday, June

26th. He wants to file suit by the 1st of July if it is necessary, for two reasons:

- (1) to protect ourselves under the statute of limitations, and
- (2) to maintain his credibility with GE (he told GE we would file by July 1 if there is no settlement by that date).

Please review the cases he has referred to and prepare a new draft of the Complaint by Thursday, June 22nd. We can then discuss it, make whatever changes are appropriate and send it off to him on Friday, June 23rd.

cc: J. Randall Jones

0829H