DEPOSITION EXHIBIT 1 7-22-93 SR

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Attorneys for Plaintiff
NEVADA POWER COMPANY
a Nevada corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA POWER COMPANY, etc., Plaintiff, vs. MONSANTO COMPANY, etc., et al., Defendants.	CASE CV-S-89-555-LDG (LRL) **PLAINTIFF NEVADA POWER COMPANY'S NOTICE OF TAKING DEPOSITION OF MONSANTO COMPANY PURSUANT TO FRCP 30(b)(6)**

TO DEFENDANTS MONSANTO COMPANY, a foreign corporation; GENERAL ELECTRIC COMPANY, a foreign corporation; WESTINGHOUSE ELECTRIC CORPORATION, a foreign corporation; and to their attorneys of record herein:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiff Nevada Power Company will take the deposition of defendant Monsanto Company at 9:00 a.m. on July 23, 1993, at the offices of Husch & Eppenberger, 100 North

Broadway, Suite #1300, St. Louis, Missouri. The deposition will be taken upon oral examination before a Notary Public or before some other officer authorized by law to administer oaths until completed. You are invited to attend and cross-examine.

The individual(s) produced shall be the one(s) who can testify concerning the subjects listed on Attachment "A" to this Notice.

DATED: July 5th, 1993

BRADLEY & MERRELL
RALPH A. BRADLEY
PAUL E. MERRELL

By: _____

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SENT BY: ; 21 00 ; 3:00PM ; BRADLEY AND MERRELL ; 01404704442;# 3/ 3

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of July, 1993, the foregoing PLAINTIFF NEVADA POWER COMPANY'S NOTICE OF TAKING DEPOSITION OF DEFENDANT MONSANTO COMPANY PURSUANT TO FRCP 30(b)(6) was served on the following parties:

KEY:
F - Via fax
FE - Via Federal Express
H - Via hand delivery

F Steven R. Kuney, Esq.
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Paul E. Merrell
An employee of BRADLEY & MERRELL
c/o JONES, JONES, CLOSE & BROWN

ATTACHMENT "A"

Produce the person(s) most knowledgable about:

1. Your company's testing, at any time, of PCBs or mixtures containing PCBs, for the presence of polychlorinated dioxin(s) or polychlorinated dibenzofuran(s); the conditions of such tests; the results thereof; and dissemination of any of the foregoing information both within and outside the company.

2. Your company's acquisition, at any time, of results of testing of PCBs or mixtures containing PCBs for the presence of polychlorinated dioxin(s) or polychlorinated dibenzofuran(s), as well as any dissemination of any of the foregoing information both within and outside the company.

3. All discussions within the company of any of the information described in categories 1 and 2 above, the hazards and consequences thereof, or what actions the company should or did take in response thereto.

4. All means by which any of the information described in categories 1, 2, and 3 above were either directly communicated to Nevada Power or which were communicated in such a way that Nevada Power should have learned of the information.

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