

BRADLEY & MERRELL
JONES, JONES, CLOSE & BROWN, CHARTERED
Seventh Floor — Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101-6026
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7-21-93

TO: Ralph A. Bradley
c/o Cheshire Inn

FAX #: (314) 647-0442

PHONE #: (314) 647-7300

FROM: Bradley & Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: 30 (b)(6) notice re dioxins

NUMBER OF PAGES (including cover page): - 8 -

MESSAGE:

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IF YOU EXPERIENCE PROBLEMS WITH THIS TRANSMISSION,
please call (702) 385-4202 and ask for: Operator, Ext. 615

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TRANSMISSION REPORT

THIS DOCUMENT WAS CONFIRMED
(REDUCED SAMPLE ABOVE - SEE DETAILS BELOW)

**** COUNT ****

TOTAL PAGES SCANNED : 8

TOTAL PAGES CONFIRMED : 8

*** SEND ***

No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	3146470442	7-21-93 5:34PM	4'43"	8/ 8		COMPLETED 9600

TOTAL 0:04'43" 8

NOTE:

No. : OPERATION NUMBER 48 : 4800BPS SELECTED EC : ERROR CORRECT G2 : G2 COMMUNICATION
PD : POLLED BY REMOTE SF : STORE & FORWARD RI : RELAY INITIATE RS : RELAY STATION
MB : SEND TO MAILBOX PG : POLLING A REMOTE MP : MULTI-POLLING RM : RECEIVE TO MEMORY

1 J. RANDALL JONES, ESQ.
CHARLES H. McCREA, SR., ESQ.
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JONES, JONES, CLOSE
3 & BROWN, CHARTERED
700 Bank of America Plaza
4 300 South Fourth Street
Las Vegas, Nevada 89101-6026
5 Telephone: (702) 385-4202

6 RALPH A. BRADLEY, ESQ.
PAUL E. MERRELL, ESQ.
7 BRADLEY & MERRELL
c/o JONES, JONES, CLOSE
8 & BROWN, CHARTERED
700 Bank of America Plaza
9 300 South Fourth Street
Las Vegas, Nevada 89101-6026
10 Telephone: (702) 385-4202

11 Attorneys for Plaintiff
NEVADA POWER COMPANY
12 a Nevada corporation

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

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

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

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

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

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

7 DATED: July *5th*, 1993

BRADLEY & MERRELL
RALPH A. BRADLEY
PAUL E. MERRELL

9
10 By: *Paul E. Merrell*

PAUL E. MERRELL
Coordinating Attorney
BRADLEY & MERRELL
c/o JONES, JONES, CLOSE & BROWN
300 South Fourth St., Suite 700
Las Vegas, Nevada 89101
(702) 385-4202

Attorneys for Plaintiff
NEVADA POWER COMPANY, a Nevada
corporation

16 Other Counsel for
17 Plaintiff Nevada Power Company:

18 DAVID S. McCREA, ESQ.
McCREA & McCREA
19 119 South Walnut Street
Post Office Box 1310
20 Bloomington, Indiana 47402
Telephone: (812) 336-4840
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1 FREDERICK M. BARON, ESQ.
RUSSELL WILLS BUDD, ESQ.
2 JANE N. SAGINAW, ESQ.
BRIAN D. WEINSTEIN, ESQ.
3 PAUL F. DONSBACH, ESQ.
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6 MICHAEL T. GALLAGHER, ESQ.
CRAIG LEWIS, ESQ.
7 JOHN H. KIM, ESQ.
FISHER, GALLAGHER & LEWIS, L.L.P.
8 1000 Louisiana, 70th Floor
Houston, Texas 77002
9 Telephone: (713) 654-4433

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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.
Williams & Connolly
725 12th Street, N.W.
Washington, DC 20005
Fax No.: (202) 434-5029
Attorneys for Defendants MONSANTO COMPANY, GENERAL
ELECTRIC COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

F

Arvin Maskin, Esq.
Konrad L. Cailteux, Esq.
Weil, Gotshal & Manges
767 Fifth Avenue
New York, NY 10153
Fax No.: (212) 310-8007
Attorneys for Defendant WESTINGHOUSE ELECTRIC CORPORATION

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J. Bruce Alverson, Esq.
Alverson, Taylor, Mortensen & Nelson
3821 West Charleston Boulevard
Las Vegas, NV 89102
Fax No.: (702) 385-7000
Attorneys for Defendant GENERAL ELECTRIC COMPANY

F

John L. Thorndal, Esq.
Thorndal, Backus, Maupin & Armstrong
1100 East Bridger Avenue
Las Vegas, NV 89101
Fax No.: (702) 366-0327
Attorneys for Defendants MONSANTO COMPANY and
WESTINGHOUSE ELECTRIC CORPORATION

F

Bruce A. Featherstone, Esq.
Kirkland & Ellis
1999 Broadway, Suite 4000
Denver, CO 80202
Fax No.: (303) 291-3300
Attorneys for Defendant MONSANTO COMPANY

Paul J. Merrell

An employee of BRADLEY & MERRELL
c/o JONES, JONES, CLOSE & BROWN

ATTACHMENT "A"

Produce the person(s) most knowledgeable 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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(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7-5-93

TO: John L. Thorndal, Esq.	FAX #: (702) 366-0327
	PHONE #: (702) 366-0622
TO: J. Bruce Alverson, Esq.	FAX #: (702) 385-7000
	PHONE #: (702) 384-7000
TO: Bruce A. Featherstone, Esq.	FAX #: (303) 291-3334
	PHONE #: (303) 291-3000
TO: Steven R. Kuney, Esq.	FAX #: (202) 434-5029
	PHONE #: (202) 434-5843
TO: Arvin Maskin, Esq.	FAX #: (212) 310-8007 <u>OR</u> (212) 735-4657
	PHONE #: (212) 310-8000

FROM: Paul Merrill

MATTER/MATTER NO.: Nevada Power v. Monsanto, et al., #11927.2

DOCUMENT(S) DESCRIPTION: 30(6)(6) Notice

NUMBER OF PAGES (including cover page): - 6 -

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please call (702) 385-4202 and ask for: Randy Andreini. Ext. 615

STORE & FORWARD REPORT

DATE/TIME
LOCAL TERMINAL ID.
LOCAL NAME
COMPANY LOGO

7- 5-83 2:20PM
7023851655
BRADLEY AND MERRELL

No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
001	JOHN THORNDAL	7- 5-83 2:03PM	2'27"	6/ 6	EC SF	COMPLETED 9600
002	BRUCE ALVERSON	2:05PM	1'55"	6/ 6	EC SF	COMPLETED 9600
003	B FEATHERSTONE	2:08PM	7'50"	6/ 6	EC SF	COMPLETED 4800
004	STEVEN KUNEY	2:16PM	1'31"	6/ 6	EC SF	COMPLETED 14400
005	ARVIN MASKIN	2:24PM	2'26"	6/ 6	EC SF	COMPLETED 9600

TOTAL 0:16'09" 30

DIAL GROUP

No.	DIRECTORY NUMBERS
006	001 002 003 004 005

NOTE:

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Deliver to Mr. Jones

MESSAGE:

NUMBER OF PAGES (including cover page): 9

Kindred office

DOCUMENT(S) DESCRIPTION:

CLIENT/MATTER NO.: 11927.2

CLIENT/MATTER: Nevada Power v. Monsanto

FROM: Bradley & Merrell

TO: David Schick, Esq.
c/o The Westin Hotel
Shady Side Room
FAX #: (412) 553-5239
PHONE #: (412) 281-7100

DATE: 7-21-93

MESSAGE FROM XEROX 7024: (702) 385-1655

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TOTAL PAGES CONFIRMED : 9

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	4125535239	7-21-93 6:03PM	5'30"	9/ 9		COMPLETED 9600

TOTAL 0:05'30" 9

NOTE:

No. : OPERATION NUMBER 48 : 4800BPS SELECTED EC : ERROR CORRECT G2 : G2 COMMUNICATION
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PHONE #: (412) 281-7100

FROM: Bradley & Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION:

Judge's order

NUMBER OF PAGES (including cover page): 9

MESSAGE: *Please
Deliver immediately*

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