

LAW OFFICES

JONES, JONES, CLOSE & BROWN
CHARTERED

A PROFESSIONAL CORPORATION

SEVENTH FLOOR - VALLEY BANK PLAZA

300 SOUTH FOURTH STREET

LAS VEGAS, NEVADA 89101-6026

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OF COUNSEL
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PAUL A. LEMCKE
MARK D. LERNER
RENEE R. REUTHER
STEPHEN M. RICE
ERIKA PALMER ROGERS
JANE A. STECKBECK
KEVIN R. STOLWORTHY
JOHN M. SULLIVAN

May 19, 1992

David S. McCrea, Esq.
McCrea & McCrea
119 S. Walnut Street
P.O. Box 1310
Bloomington, IN 47402

Bill Snyder, Esq.
P.O. Box 612
Helena, MT 59624

Paul E. Merrell, Esq.
7493 East Five Rivers Road
Tidewater, OR 97390

Re: Deposition Notices in Nevada Power v. Monsanto, et al.

Gentlemen:

Enclosed herewith are seven draft deposition notices which we discussed previously. You will note that I have made reference to a subpoena duces tecum for William Pagageorge, Dr. Kelly and Elizabeth Whalen. I have not made reference to a subpoena duces tecum for the other individuals since it is my understanding they are currently employed by the Defendants. Consequently, a request for production of documents would be the only method by which we could request those individuals produce documents. I also did not do a subpoena duces tecum for Philip Bainbridge since I assumed any documents he would have would probably be privileged. However, if you think it would be worthwhile to serve him with a subpoena anyway, I am happy to do so.

As for the exhibit list of the things to be produced, I wasn't sure who should draft that so I have not included one. I would be happy to do it but thought that David may be able to draft a more complete list since he is more knowledgeable of what documents the deponents may have.

You will also note that I left the dates blank for all of these subpoenas and that is the real purpose of this letter. We

RENO OFFICE:

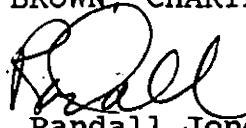
333 MARSH AVENUE • RENO, NEVADA 89504
TELEPHONE (702) 348-0880 • (702) 323-8633
TELECOPIER (702) 348-0886 • (702) 323-8668

David McCrea, Esq.
May 19, 1992
Page 2

need to decide who will take the depositions and when they will be taken. Please let me know your thoughts on that subject so I can get the notices finalized.

Very truly yours,

JONES, JONES, CLOSE
& BROWN, CHARTERED


J. Randall Jones, Esq.

JRJ/jls
Enclosures

cc: Charles McCrea, Esq.

jls\counsel.ltr

J. RANDALL JONES, ESQ.
CHARLES H. McCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF PHILIP BAINBRIDGE, ESQ.

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their
attorneys:

PLEASE TAKE NOTICE that at _____ .M. on the _____
day of _____, 19____, at the law offices of Jones,
Jones, Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300
South Fourth Street, Las Vegas, Nevada, Plaintiff in the
above-entitled action will take the deposition of PHILIP

BAINBRIDGE, ESQ., upon oral examination, pursuant to Rule 30 of the Nevada Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. Oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

DATED this _____ day of _____, 1992

JONES, JONES, CLOSE
& BROWN, CHARTERED

By _____
J. RANDALL, ESQ.
700 Valley Bank Plaza
300 So. Fourth Street
Las Vegas, NV 89101-6026

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF PHILIP BAINBRIDGE, ESQ. was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED

J. RANDALL JONES, ESQ.
CHARLES H. McCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF D. M. SAUTER

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their
attorneys:

PLEASE TAKE NOTICE that at _____ .M. on the _____
day of _____, 19____, at the law offices of Jones,
Jones, Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300
South Fourth Street, Las Vegas, Nevada, Plaintiff in the
above-entitled action will take the deposition of D. M. SAUTER,

upon oral examination, pursuant to Rule 30 of the Nevada Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. Oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

DATED this _____ day of _____, 1992

JONES, JONES, CLOSE
& BROWN, CHARTERED

By _____
J. RANDALL, ESQ.
700 Valley Bank Plaza
300 So. Fourth Street
Las Vegas, NV 89101-6026

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF D. M. SAUTER was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED

J. RANDALL JONES, ESQ.
CHARLES H. MCCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF G. W. WIEMER

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their
attorneys:

PLEASE TAKE NOTICE that at _____ .M. on the _____
day of _____, 19____, at the law offices of Jones,
Jones, Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300
South Fourth Street, Las Vegas, Nevada, Plaintiff in the
above-entitled action will take the deposition of G. W. WIEMER,

upon oral examination, pursuant to Rule 30 of the Nevada Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. Oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

DATED this _____ day of _____, 1992

JONES, JONES, CLOSE
& BROWN, CHARTERED

By _____
J. RANDALL, ESQ.
700 Valley Bank Plaza
300 So. Fourth Street
Las Vegas, NV 89101-6026

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF G. W. WIEMER was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED

J. RANDALL JONES, ESQ.
CHARLES H. McCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF STEVEN B. HAMILTON, JR.

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their
attorneys:

PLEASE TAKE NOTICE that at _____ .M. on the _____
day of _____, 19____, at the law offices of Jones,
Jones, Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300
South Fourth Street, Las Vegas, Nevada, Plaintiff in the
above-entitled action will take the deposition of STEVEN B.

HAMILTON, JR., upon oral examination, pursuant to Rule 30 of the Nevada Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. Oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

DATED this _____ day of _____, 1992

JONES, JONES, CLOSE
& BROWN, CHARTERED

By _____
J. RANDALL, ESQ.
700 Valley Bank Plaza
300 So. Fourth Street
Las Vegas, NV 89101-6026

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF STEVEN B. HAMILTON, JR. was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED

J. RANDALL JONES, ESQ.
CHARLES H. MCCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF WILLIAM PAGAGEORGE

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their attorneys:

PLEASE TAKE NOTICE that at _____ .M. on the _____ day
of _____, 19____, at the law offices of Jones, Jones,
Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300 South
Fourth Street, Las Vegas, Nevada, Plaintiff in the above-entitled
action will take the deposition of WILLIAM PAGAGEORGE, upon oral
examination, pursuant to Rule 30 of the Nevada Rules of Civil

1 Procedure, before a Notary Public, or before some other officer
2 authorized by law to administer oaths. The witness has or will be
3 served with a Subpoena Duces Tecum requesting that the witness
4 produce the documents listed in Exhibit "A", which exhibit is
5 expressly incorporated herein by this reference. Oral examination
6 will continue from day to day until completed. You are invited to
7 attend and cross-examine.

8 DATED this _____ day of _____, 1992

9 JONES, JONES, CLOSE
10 & BROWN, CHARTERED

11 By _____
12 J. RANDALL, ESQ.
13 700 Valley Bank Plaza
14 300 So. Fourth Street
15 Las Vegas, NV 89101-6026

16 ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF WILLIAM PAGAGEORGE was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED

jls\nvpower\pagageor.ntd

J. RANDALL JONES, ESQ.
CHARLES H. MCCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF DR. R. EMMETT KELLY

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their
attorneys:

PLEASE TAKE NOTICE that at _____ M. on the _____
day of _____, 19____, at the law offices of Jones,
Jones, Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300
South Fourth Street, Las Vegas, Nevada, Plaintiff in the
above-entitled action will take the deposition of DR. R. EMMETT

KELLY, upon oral examination, pursuant to Rule 30 of the Nevada Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. The witness has or will be served with a Subpoena Duces Tecum requesting that the witness produce the documents listed in Exhibit "A", which exhibit is expressly incorporated herein by this reference. Oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

DATED this _____ day of _____, 1992

JONES, JONES, CLOSE
& BROWN, CHARTERED

By _____
J. RANDALL, ESQ.
700 Valley Bank Plaza
300 So. Fourth Street
Las Vegas, NV 89101-6026

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF DR. R. EMMETT KELLY was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED

J. RANDALL JONES, ESQ.
CHARLES H. MCCREA, SR., ESQ.
JONES, JONES, CLOSE
& BROWN, CHARTERED
700 Valley Bank Plaza
300 South Fourth Street
Las Vegas, NV 89101-6026
Telephone: (702) 385-4202

ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA POWER COMPANY, a Nevada
corporation,

Plaintiff,

vs.

MONSANTO COMPANY, a foreign
corporation; GENERAL ELECTRIC
COMPANY, a foreign corporation;
WESTINGHOUSE ELECTRIC
CORPORATION, a foreign
corporation; and DOES I through
XXV, inclusive,

Defendants.

CASE NO. CV-S-89-555-LDG
(LRL)

NOTICE OF TAKING DEPOSITION
OF ELIZABETH WHALEN

TO: MONSANTO COMPANY, GENERAL ELECTRIC COMPANY and WESTINGHOUSE
ELECTRIC CORPORATION, Defendants; and

TO: JOHN L. THORNDAL, ESQ., JEFFREY S. KLEIN, ESQ., BRUCE A.
FEATHERSTONE, ESQ. and J. BRUCE ALVERSON, ESQ., their
attorneys:

PLEASE TAKE NOTICE that at _____ M. on the _____
day of _____, 19____, at the law offices of Jones,
Jones, Close & Brown, Chartered, Valley Bank Plaza, Suite 700, 300
South Fourth Street, Las Vegas, Nevada, Plaintiff in the
above-entitled action will take the deposition of ELIZABETH WHALEN,

upon oral examination, pursuant to Rule 30 of the Nevada Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. The witness has or will be served with a Subpoena Duces Tecum requesting that the witness produce the documents listed in Exhibit "A", which exhibit is expressly incorporated herein by this reference. Oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

DATED this _____ day of _____, 1992

JONES, JONES, CLOSE
& BROWN, CHARTERED

By _____
J. RANDALL, ESQ.
700 Valley Bank Plaza
300 So. Fourth Street
Las Vegas, NV 89101-6026

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 1992, the foregoing NOTICE OF TAKING DEPOSITION OF ELIZABETH WHALEN was served on the parties by mailing a copy thereof, first class mail, postage prepaid, to:

JEFFREY S. KLEIN, ESQ.
ERIC ORDWAY, ESQ.
767 Fifth Avenue
New York, N.Y. 10153
Attorneys for Defendant
WESTINGHOUSE ELECTRIC CORPORATION

BRUCE A. FEATHERSTONE, ESQ.
JOHN H. TATLOCK, ESQ.
1999 Broadway, Suite 4000
Denver, CO 80202
Attorneys for Defendant
MONSANTO COMPANY

JOHN L. THORNDAL, ESQ.
PEGGY A. LEEN, ESQ.
1100 East Bridger Avenue
P.O. Drawer 2070
Las Vegas, Nevada 89125-2070
Attorneys for Defendants
MONSANTO COMPANY and WESTINGHOUSE ELECTRIC CORPORATION

J. BRUCE ALVERSON, ESQ.
DAVID R. CLAYSON, ESQ.
600 South Eighth Street
Las Vegas, Nevada 89101
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

An employee of JONES, JONES,
CLOSE & BROWN, CHARTERED