

DEPOSITION
EXHIBIT

7-22-93

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Attorneys for Plaintiff
NEVADA POWER COMPANY
a Nevada corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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

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

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 *Stu*, 1993

BRADLEY & MERRELL
RALPH A. BRADLEY
PAUL E. MERRELL

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10 By: *Paul E. Merrell*

PAUL E. MERRELL
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15 NEVADA POWER COMPANY, a Nevada
16 corporation

17 Other Counsel for
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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

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Paul J. Jones

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.