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MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 30, 1993

TO: Dr. Arnold Schecter

FAX #: (607) 770-8623

PHONE #: (607) 770-8521

FROM: Roberta Straub, Esq.

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION:

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MEMORANDUM

TO: Dr. Arnold Schecter
FROM: Roberta Straub, Esq. *RS*
RE: Expert Deposition Dates
DATE: July 30, 1993

This is just a hard copy of what I told you over the telephone earlier today. Under the new stipulation, Nevada Power expert disclosure statements are not due until August 20, 1993. The time for deposing Nevada Power's experts will begin on August 27, 1993 and continue until October 1, 1993. Please let us know your available dates from the above schedule.

I also am acknowledging your desire to be deposed between August 23 and August 27th, 1993, however I cannot make any guarantees. I understand the 24th of August would be best for you.

In addition, under cover of this memo, I am including another copy of the proposed disclosure statement which you asked that I telefax to you.

Thank you, Dr. Schecter.

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Nevada Power Company v. Monsanto Co., et al.
Case No. CV-S-89-555-LDG-LRL

PRETRIAL WITNESS STATEMENT

Dr. Arnold Schecter
88 Aldridge Avenue
Binghamton, New York 13903

Binghamton

SUMMARY OF TESTIMONY

Dr. Schecter is a senior medical and scientific authority on many aspects of, including but not limited to public health and medical aspects of PCB residues including the closely related PCDD and PCDF residues in human tissues in industrialized as well as less industrialized nations. Dr. Schecter has devoted over 10 years' time to the study of PCBs, PCDDs and PCDFs with patients. Dr. Schecter has been an advisor/consultant or peer reviewer to the World Health Organization (WHO), U.S. Environmental Protection Agency (EPA), and the Agency for Toxic Diseases and Substance Registry of the Centers for Disease Control (CDC) with respect to these chemicals. In addition, Dr. Schecter conducts ongoing research in the United States, Russia, China, Vietnam, and Japan on PCBs, PCDDs and PCDFs. As a county Health Commissioner, Dr. Schecter was the first to point out the dangers of PCBs, PCDDs and PCDFs in PCB transformer fires.

Dr. Schecter received a B.A. in Liberal Arts and a B.S. in Physiology and Neurophysiology from the University of Chicago, his M.D. from Howard University Medical School, and his M.P.H. from

Columbia University School of Public Health. Dr. Schecter's post-graduate training has included a several week mini-residency in Occupational Medicine at the University of Cincinnati College of Medicine and training in Occupational Medicine at the University of Illinois Medical School in Chicago, Illinois, at Mt. Sinai Medical Center in New York and at New York University Medical Center and various courses at Occupational Medical national meetings.

Currently, and for the past thirteen years, Dr. Schecter has been a professor at the Department of Preventive Medicine, State University of New York (SUNY) Health Science Center in Syracuse, New York at the Clinical Campus at Binghamton, New York. Previously he trained and served on the faculties of Harvard Medical School, SUNY Downstate Medical School and the New Jersey Medical School. He is also a staff member at Our Lady of Lourdes Hospital in Binghamton, New York and the United Health Services hospitals in Binghamton and Johnson City, New York.

As an extensively published author on PCBs, PCDDs and PCDFs, Dr. Schecter's expertise is relied upon by many persons researching the issues surrounding these chemicals.

Some of Dr. Schecter's membership affiliations are: the American Public Health Association, the Association of Teachers of Preventive Medicine; the American College of Epidemiology; he is a Fellow in the American College of Occupational and Environmental Medicine; a Fellow in the American College of Preventive Medicine; a Fellow in the American College of Physicians; a member of the American Association for the Advancement of Science; and a member of the Society for Epidemiologic Research and belongs to other

other scientific and professional organizations.

In this litigation, Dr. Schecter is presented as an expert on the toxicology of PCBs, dioxins and dibenzofurans (PCB related compounds). In the last eleven years, Dr. Schecter's research has focused on PCB, PCDD and PCDF residues found in patients' bodies and movement of the PCBs, PCDDs and PCDFs through the human body and in the environment; the rate of elimination of PCBs, PCDDs and PCDFs; and the movement of PCBs, PCDDs and PCDFs through the placenta and to the fetus.

Dr. Schecter's research has also focused on the background exposures of human populations to PCBs, PCDDs and PCDFs as well as the bioaccumulation of PCBs, PCDDs and PCDFs in the general human population. Dr. Schecter will testify to the impact of additional PCBs, PCDDs and PCDFs when added to the background levels already present in the human population.

Dr. Schecter is of the opinion that PCBs, PCDDs and PCDFs are inherently dangerous to laboratory animals, wildlife and humans. He is also of the opinion that levels of PCBs, PCDDs and PCDFs must be reduced to lower the existing background human body burdens. Dr. Schecter will also testify that the PCB equipment at Nevada Power which is above and below the existing EPA standards is defectively hazardous because of toxicity, persistence and bioaccumulation.

The basis for Dr. Schecter's testimony will be his education, research experience, public health and medical experience, and training and understanding of the current literature on PCBs, PCDDs and PCDFs. Dr. Schecter will also review publications from his

published research as well as other research and reports generated by research on PCBs, PCDDs and PCDFs.

Among the more general sources of Dr. Schecter's information will be general scientific literature on PCBs, PCDDs and PCDFs along with recent NIOSH, EPA, CDC, Air Force, National Academy of Sciences, and other government agency research. Dr. Schecter may review materials covered at scientific meetings and information covered with or discussed with other experts. Another category of information upon which Dr. Schecter may rely includes pertinent research provided by federal or state agencies and symposia and other publications dealing with halogenated aromatic hydrocarbon toxicity.

At the request of Nevada Power attorneys, Dr. Schecter may also review learned treatises of other experts or any other documents related to the case which Nevada Power attorneys provide for his review.

Finally, Dr. Schecter may also be called upon to explain and define any scientific terms used by the defendants in documents gathered by Nevada Power during discovery and presented to him.