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EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

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August 3, 1993

BY FACSIMILE

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Re: Nevada Power Litigation

Dear Paul and John:

I'm not sure who is now handling scheduling on your side, so I write to you both. Under the stipulation developed the week of July 19, GE agreed to make John Brown and Dick Biernacki available for the continuation of their depositions (Dr. Brown's in his personal capacity, Mr. Biernacki's as GE's 30(b)(6) designee on document retention and warnings). As to the two 30(b)(6) depositions, of course, we still need to come to some agreement on the scope of the continued examination, but that should not stop us from lining up the schedule. Dr. Brown and Mr. Biernacki are available in the Albany/Schenectady area on August 24, 25, 26, and 27. I leave it to you whether you want to do everything in one day, or set aside two consecutive days. Please advise me as soon as possible which dates are good for you, so I can let the witnesses know.

Sincerely yours,



Robert J. Shaughnessy