

MEMORANDUM

TO: File - Nevada Power Company v. Monsanto Company et al.
FROM: Charles H. McCrea, Sr. 
DATE: February 25, 1992
RE: Organization of File

The file in this case, now spread over about 4 file drawers, badly needs organization. It should first be divided into two major categories - District Court Proceedings and 9th Circuit Court of Appeals Proceedings. Under each of these major categories, the documents should be subdivided into the subcategories listed below to the extent applicable. An index should be prepared for each of these major categories, with sub-indices for each subcategory.

1. Correspondence with and memoranda exchanged between the following, arranged chronologically:

- * Client
- * Defendants and their Counsel
- * Co-Counsel (McCrea & McCrea; Tom Kotoski, Paul Merrell, Bill Snyder)
- * The Court
- * Miscellaneous

2. Pleadings, briefs, transcripts of court proceedings, court orders and decision, etc. (everything filed with the court, including all of plaintiff's and defendants' exhibits, which should be indexed).

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3. All documents discovered by defendants, including transcripts of depositions of Plaintiff's employees, identifying the documents used by defendants as exhibits.

4. All documents discovered by plaintiff, identifying the documents used by plaintiff as exhibits.

5. Research memoranda.

6. Miscellaneous documents (newspaper articles, etc., on PCBs and related matter for possible future reference).

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