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MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7/15/93

TO: David E. Schalk, Esq.

FAX #: (203) 378-4958

PHONE #: (203) 378-1400

FROM: Bradley & Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION:

Memo

NUMBER OF PAGES (including cover page): 3

MESSAGE:

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MESSAGE FROM XEROX 7024: (702) 385-1855

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MEMORANDUM

TO: David Schalk and File
FROM: Paul Merrell 
RE: Nevada Power Company v. Monsanto Company, et al.
DATE: July 15, 1993

I spoke with Konrad Cailteux at approximately 1:30 p.m. regarding matters relating to the pending depositions on Westinghouse destruction of evidence.

He informed me that, pertaining to the prior testimonies and affidavits of Westinghouse deponents, there are none other than a single deposition of Wayne Bickerstaff plus Mr. Bickerstaff's deposition from the insurance litigation. Konrad expects to ship those documents to us via Federal Express tomorrow for Saturday morning delivery.

Regarding the documents on which Westinghouse has waived privilege that were appended to the Plaintiff's Exhibit 1212, Konrad will ship those along with the depositions.

Regarding the documents that were referenced in our opposition to Westinghouse's motion for a protective order, Konrad believes that Westinghouse has now located those documents and is now copying them and Bates numbering them for us. He will attempt to ship those documents on Saturday, but may need to bring them to the deposition instead.

Memorandum to David Schalk and File
July 15, 1993
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Regarding the type script of Jeff Bair's notes, Konrad informed me that all of the notes that we had typed are not, in fact, Jeff Bair's. Jeff will identify who those notes belong to at his deposition. I told Konrad that we did not expect to receive Bair's corrected type script until the time set for his deposition.

Regarding the PMK deposition on the Westinghouse librarian, we agreed that it would be taken towards the end of the week. I told Konrad that we would get at least a first cut to him tomorrow on the scope of that deposition and refine it on Monday.

PEM:dd
cc: David Schalk, Esq.

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