

Telephone: (702) 385-4202

BRADLEY & MERRELL
c/o Jones, Jones, Close & Brown
300 South Fourth Street, Seventh Floor
Las Vegas, Nevada 89101-6026

Fax: (702) 385-1655

July 18, 1993

VIA TELEFAX

Konrad L. Cailteux
Weil, Gotshal & Manges
767 Fifth Avenue
New York, New York 10153

Re: Nevada Power Company v. Monsanto Company, et al.
USDC, District of Nevada Case CV-S-89-555-LDG (LRL)

Dear Konrad:

I received and thank you for the Bickerstaff depositions that arrived yesterday as promised, together with the documents Westinghouse has waived privilege to.

I noted, however, that none of the transcripts included the exhibits cited. I would appreciate it if you could locate the exhibits and provide them promptly so that these deposition transcripts are complete. I also noted that none of the Bickerstaff deposition transcripts were signed by the deponent. I, therefore, ask that Mr. Bickerstaff review both transcripts and be prepared to ratify them under oath during the deposition we take of him. For that reason, I feel it is critical that we obtain the exhibits.

Your shipment Saturday did not include the documents cited in our response to Westinghouse's motion for protective order. I believe when we last spoke you had indicated that Westinghouse had in fact located these documents and that you were slated to receive them and would ship them so that they would arrive in the Saturday shipment. Please advise me whether these documents are forthcoming and, if so, when so that I may coordinate their addition to our files and ensure that they get to Mr. Schalk in time for the depositions.

Konrad L. Cailteux
July 18, 1993
Page 2

Should you need to contact David Schalk prior to beginning the 30(b)(6) deposition on Tuesday morning, you may reach him at the Gateway Hilton in Pittsburgh, (412) 391-4600. Please call me if I may do anything to facilitate these depositions going forward as smoothly as possible.

Again, I appreciate your cooperative approach to these issues.

Sincerely,

BRADLEY & MERRELL

A handwritten signature in dark ink, appearing to read "Paul E. Merrell", written over the typed name.

PAUL E. MERRELL

PEM:lsg

cc: David E. Schalk
David S. McCrea
Michael T. Gallagher
John H. Kim

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c/o JONES, JONES, CLOSE & BROWN, CHARTERED
Seventh Floor — Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101-6026
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 18, 1993

TO: Konrad L. Cailteaux

FAX #: (212) 310-8516

PHONE #: (212) 310-8904

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power v. Monsanto, et al.

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: July 18, 1993 letter re: exhibits to Bickerstaff deposition transcript

NUMBER OF PAGES (including cover page): Three (3)

MESSAGE:

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	CALITEUX	7-18-93 7:04PM	1'13"	3/ 3	EC	COMPLETED 9600

TOTAL 0:01'13" 3

NOTE:

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MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 18, 1993

TO: Michael T. Gallagher

FAX #: (713) 654-5070

PHONE #: (713) 654-4433

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: July 18, 1993 letter to Konrad Cailteux re: exhibits to Bickerstaff deposition transcript

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MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 18, 1993

TO: Michael T. Gallagher

FAX #: (713) 654-6070

PHONE #: (713) 654-4433

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
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TOTAL 0:01'16" 3

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Seventh Floor — Bank of America Plaza
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Las Vegas, Nevada 89101-6026
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 18, 1993.

TO: David McCrea

FAX #: (812) 336-5307

PHONE #: (812) 336-4840

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power/Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: July 18, 1993 letter to Konrad Cailteux re: exhibits to Bickerstaff deposition transcript

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MESSAGE FROM XEROX 7024: (702) 386-1655

DATE: July 18, 1993

TO: David McCrea

FAX #: (812) 336-6307

PHONE #: (812) 336-4840

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power/Monsanto

CLIENT/MATTER NO.: 11927.2

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	D. MCCREA	7-18-83 7:08PM	1'59"	3/ 3		COMPLETED 9600

TOTAL 0:01'59" 3

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MB : SEND TO MAILBOX PG : POLLING A REMOTE MP : MULTI-POLLING RM : RECEIVE TO MEMORY

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(702) 385-4202**

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 18, 1993

TO: John H. Kim

FAX #: (713) 654-5070

PHONE #: (713) 654-4433

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: July 18, 1993 letter to Konrad Cailteux re: exhibits to Bickerstaff deposition transcript

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MESSAGE FROM XEROX 7024: (702) 385-1855

DATE: July 18, 1993

TO: John H. Kim

FAX #: (713) 654-5070

PHONE #: (713) 654-4433

FROM: Paul E. Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: July 18, 1993 letter to Konrad Calteux re: exhibits to Bickerstaff deposition transcript

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
1	KIM	7-18-83 7:11PM	1'39"	3/ 3		COMPLETED 7200

TOTAL 0:01'39" 3

NOTE:

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MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 18, 1993

TO: David E. Schalk, Esq.
c/o Hilton Hotel

FAX #: (412) 594-5161

PHONE #: (412) 391-4600

FROM: Bradley & Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: *Copy of Paul E. Merrell's July 18, 1993 letter to Konrad Caulton re: exhibits to Bickerstaff deposition transcript*

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Las Vegas, Nevada 89101-6026
(702) 385-4202

MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: July 15, 1993

TO: David E. Schalk, Esq.
c/o Hilton Hotel

FAX #: (412) 594-5161

PHONE #: (412) 391-4800

FROM: Bradley & Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

DOCUMENT(S) DESCRIPTION: *Copy of Paul E. Merrell's July 15, 1993 letter to Ronald Cailtean re: Exhibits to Pickstaff deposition transcript*

NUMBER OF PAGES (including cover page): Three (3)

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1	412 594 5161	7-18-83 7:13PM	1'30"	3/ 3		COMPLETED 9600

TOTAL 0:01'30" 3

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