

RELATED CORRESPONDENCE

EDELSTEIN AND PAYNE  
ATTORNEYS AT LAW  
723 WEST JOHNSON STREET  
POST OFFICE BOX 12607  
RALEIGH, NORTH CAROLINA 27605



STEVEN R. EDELSTEIN  
M. TRAVIS PAYNE

June 27, 1983

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John H. O'Neill, Jr.  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N.W.  
Washington, D.C. 20036

Re: Revisions to Joint Intervenors' Interrogatories

Dear John:

Enclosed is the revised version of Joint Interrogatories on Contentions IV, V and VI. Essentially I have sequentially re-numbered the interrogatories that were erroneously labeled as being on Contentions III, IV, and V.

Joint Intervenors view each of the specific interrogatories as applying to the following contentions

<u>INTERROGATORY</u>	<u>RELEVANT TO CONTENTION</u>
14	IV and VI
15	IV
16	IV, V, and VI
17	IV and VI
18	IV and VI
19	V
20	V
21	V and VI
22	IV, V, and VI

As you can see, several of these interrogatories apply to more than one contention. This is not surprising given the similarities in the subject matter covered by these three contentions. In some of the phone conversations we had concerning these interrogatories, a suggestion was made that if an interrogatory applied to more than one contention, we should type it out more than once. This seems a very silly waste of time and paper (my files are already bulging, and I see no need to chew up additional trees to make paper for this proceeding). For purposes of answering and/or objecting to these interrogatories, you should consider this letter and the assignment of interrogatories to contentions made above, as part of the interrogatories.

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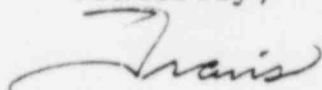
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Preparing these revised interrogatories took a lot longer than I anticipated. I apologize for that. When you are providing pro bono representation to parties, there come times when paying the bills and survival must take precedence over matters that, in the "overall scheme of things", should be of more importance. I am afraid that is what happened here.

I appreciate your cooperation and helpfulness in drawing my attention to the errors in the original interrogatories. If you have questions about this revised set, feel free to call me.

Sincerely,



M. Travis Payne

cc: Service List

MTP/bn