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September 4, 1985

Mr. Robert A. Wooldridge  
Worsham, Forsythe, Samples  
and Woodridge  
2500 2001 Bryan Tower  
Dallas, Texas 75201

SECRET NUMBER

50-445 02-2  
50-446 02-2

Dear Bob,

As you know we wish to take the depositions of certain individuals who have information relevant to the issues in this proceeding. Hopefully, it will be possible to arrange the depositions of these individuals between the parties.

We propose to provide you with a list of the individuals we would like to depose, and then arrange a time and place mutually convenient to all concerned.

If this proposal is not acceptable please reply within seven days so that we can prepare the notices of depositions and subpoenas.

The first group of Applicant's management personnel we want to arrange deposition schedules for is Mr. Michael Spence, Mr. Perry Brittain, and Mr. James Wells. (We will arrange to take Mr. Wells deposition in Charlotte, N.C.) We believe that the depositions will be approximately one day each. However, this is a "lawyer's guess" and is, of course, subject to how the depositions goes. The subject matter of the deposition will coincide with 22 topics identified in our Request for Documents, dated September 4, 1985.

Since the issues in Docket 2 are not moot, nor are they subject to your recent Motion for Reconsideration on Discovery (Re: Credibility Issues) we assume that there will be no objection to proceeding without delay.

Thank you for your prompt consideration.

Sincerely,

*Billie*

Billie Pirner Garde  
Counsel for CASE

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PDR ADDCK 05000445  
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BPG/sc

cc: Service List

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