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November 8, 2000

Re: Allendale Mutual Insurance Company v. Safety Light Corporation
NRC File No. TR-00-08
Our File No. 00222-0324

VIA FAX

Charles E. Mullins, Esquire
U.S. NUCLEAR REGULATORY COMMISSION
Room #0-15D21
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Mullins:

We appreciate your taking the time to meet with us on November 3, 2000, to discuss our client's subpoenas of Messrs. Costello and Kinneman in the above-captioned matter. Your comments and those of Messrs. Costello and Kinneman were helpful to us, and we hope that our comments, in turn, made clear to you why the testimony of an NRC witness will be important to resolution of some of the issues which are central to this litigation.

You have advised us that you expect that the General Counsel will approve our taking the deposition of one NRC witness by videotape for use at trial and have asked that we communicate with you further to designate such a witness. We have not yet determined who that witness will be – it will almost certainly be, as we discussed, either Mr. Costello or Mr. Kinneman – and we will probably not make this determination until after we have consulted with Safety Light's counsel. We understand that you will be meeting separately with Safety Light's counsel and that Messrs. Costello and Kinneman will also participate in that meeting. We would nevertheless like to get the deposition scheduled soon and would therefore appreciate your letting us know when you expect to meet with Safety Light's counsel.

Thank you again for your cooperation in this regard.

Very truly yours,

HECKER BROWN SHERRY AND JOHNSON

BY: William H. Black, Jr.

William H. Black, Jr.

WHB/rlb

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