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July 18, 1980

Ms. Susan N. Sekuler  
Assistant Attorney General  
Environmental Control Division  
188 West Randolph Street  
Suite 2315  
Chicago, Illinois 60601



Re: General Electric Company Morris Operation --  
Docket No. 70-1308

Dear Susan:

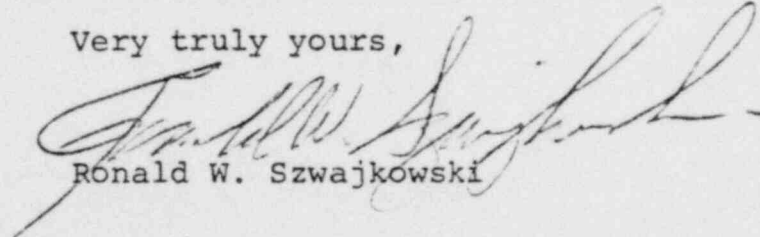
This will confirm the understandings reached during our telephone conversation earlier this morning. During that conversation, we discussed the eight notices of deposition of General Electric personnel served by your office and also the interrogatories and document production requests directed to General Electric.

Pursuant to our discussion, General Electric will respond to all interrogatories and document production requests, to which it does not object, on August 4, 1980. Within seven days, following your review of the materials provided to you by General Electric, we will discuss which of the General Electric personnel noticed for deposition by you, you actually seek to depose and the dates therefor. You have reserved your rights to seek the deposition of all General Electric personnel previously noticed by you. We have reserved our rights to object to the deposition of any such individual who, in our judgment, is not a proper deponent. We represent to you that we will not object, on a wholesale basis, to all of your notices of deposition, to your interrogatories or to your document requests.

I trust that this accurately sets forth our understanding.

Thank you very much for your cooperation in this matter.

Very truly yours,

  
Ronald W. Szwajkowski

RWS:sn

cc: As per attached  
Service List

0007280 519

