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July 21, 1975

David C. Hjelmfelt, Esq.
Goldberg, Fieldman & Hjelmfelt
Suite 550
1700 Pennsylvania Avenue, NW
Washington, D. C. 20006

Re: Requests for Proprietary Information

Dear Dave:

During the deposition interrogation conducted between April 22, 1975 and May 23, 1975, on advice from counsel representing the City of Cleveland, deponents refused to answer certain questions from Applicants' counsel asserting that the information requested was proprietary information. Pursuant to an agreement between counsel, it was decided that counsel for the City of Cleveland would transmit the requested information to Applicants' counsel by way of letter. With the exception of information received from Messrs. LaForet and Cristell, which was provided in a letter of June 13, 1975, Applicants have not yet received any of the proprietary information.

Listed below are the outstanding requests for proprietary information. Applicants now formally renew the requests for this information originally made during the depositions.

Deponent	Date	Page of Transcript
George A. Chuplis	4-22-75 4-23-75	109-110 301 302-303
Russell A. Hunt	5-6-75	29-31 40-49 50-53 54-55

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Deponent	Date	Page of Transcript
Raymond Kudukis	4-30-75	47-48 49 114-115 117 117-118 118 132-133 170
Ralph H. Meister	5-19-75	23-24 39-40 41 47 48 49 85 140-141
Russell C. Milan	5-23-75	27
George S. Pofok	4-29-75	47-48 48-49 50 52 68 71-72

As you undoubtedly recall, the Chairman of the Licensing Board indicated in response to a question I asked during the conference call of June 10, 1975, that future deposition interrogation of the above witnesses, limited to matters discussed in response to the referenced questions, may well be warranted in the event that Applicants wish to pursue further certain of the answers provided. Accordingly, a prompt submission of the proprietary information requested is imperative in order to avoid to the fullest extent possible extending depositions beyond the August 1, 1975 date agreed upon by counsel.

Sincerely yours,

Wm. Bradford Reynolds

Wm. Bradford Reynolds

WBR:ats

cc: Board Members
All Parties