ISHAM, LINCOLN & BEALE

ONE FIRST NATIONAL PLAZA FORTY-SECOND FLOOR CHICAGO, ILLINOIS 60670

TELEPHONE 312-786-7500 CABLE MAHST

January 20, 1975



Mr. Lester Kornblith, Jr.
Atomic Safety and Licensing
Board Panel
U.S. Atomic Energy Commission
Washington, D.C. 20545

Dr. Emmeth A. Luebke Atomic Safety and Licensing Board Panel U.S. Atomic Energy Commission Washington, D.C. 20545

Michael Glaser, Esq., Chairman Atomic Safety and Licensing Board 1150 17th Street, N.W. Washington, D.C. 20036

Gentlemen:

Pursuant to your request of November 18, 1974, to be informed of developments in the civil suit involving Consumers Power Company (Consumers) and Bechtel Corporation, please be advised that on January 15, 1975, Consumers filed objections to Bechtel Corporation and Bechtel Company's first set of interrogatories. Consumers also requested that the Federal Court enter an appropriate protection order concerning these interrogatories. I am enclosing a copy of Consumers objections for your information.

Very truly yours

R. Rex Renfrow, III

RRR:ss Encl.

Mr. Frank W. Karas

Mr. James P. Murray, Jr.

John G. Gleeson, Esq.

Myron M. Cherry, Esq.

Laurence M. Scoville, Jr., Esq.

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

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IN THE LETRICT COURT OF THE UNIT: STATES
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CONSUMERS POWER COMPANY, a Michigan corporation,

Plaintiff,

v.

COMBUSTION ENGINEERING, INC., a Delaware Corporation, BECHTEL CORPORATION, a Delaware corporation, BECHTEL COMPANY, a partnership, INGERSOLL-RAND COMPANY, a New Jersey corporation, and WOLVERINE TUBE DIVISION OF UNIVERSAL OIL PRODUCTS COMPANY, a Delaware corporation,

Defendants.

PROOF OF SERVICE



COUNTY OF KENT) ss.

Joanne R. Keister of 666 Old Kent Building, Grand Rapids,
Michigan, County of Kent, State of Michigan, being duly sworn,
deposes and says that on the 15th day of January, 1975,
she sent a copy of the Objection To Bechtel Corporation And
Bechtel Company's First Set Of Interrogatories To Plaintiff
Consumers Power Company And Motion For Protective Order to
Defendants' counsel Dickinson, Wright, McKean & Cudlip, 800
First National Building, Detroit, Michigan 48226; Hillman, Baxter
& Hammond, 430 Federal Square Building, Grand Rapids, Michigan
49502; Rhoades, McKee & Boer, Suite D, Waters Building, Grand
Rapids, Michigan 49502; Baker & McKenzie, 130 East Randolph Street,
Chicago, Illinois 60601; Cholette, Perkins & Buchanan, 755

Old Kent Building, Grand Rapids, Michigan 40592; Rosenman, Colin, Kaye, Petschek, Freund & Emil, 575 Madison Avenue, New York, New York 10022; Clark, Klein, Winter, Parsons & Prewitt, 1600 First Federal Building, Detroit, Michigan 48226, by regular mail with full postage prepaid thereon.

Joanne R. Keister

Subscribed and sworn to before me this 15 4 day of January, 1975.

Notary Public

My Commission Expires:

CAROL J. SALES
Notary Public, Kent County, Mich.
My Commission Expires Oct. 22, 1977