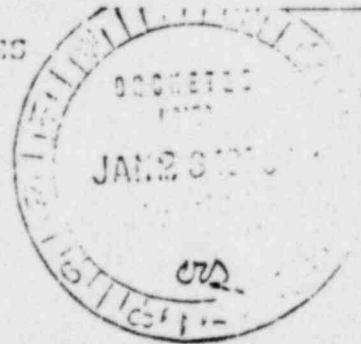


UNITED STATES OF AMERICA
IN THE U. S. DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION



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.

File No. K-74-323-CA8

OBJECTION TO BECHTEL
CORPORATION AND BECHTEL
COMPANY'S FIRST SET OF
INTERROGATORIES TO
PLAINTIFF CONSUMERS
POWER COMPANY AND MOTION
FOR PROTECTIVE ORDER

NOW COMES Plaintiff Consumers Power Company by its attorneys Varnum, Riddering, Wierengo & Christenson and, pursuant to the provisions of Rules of 33(a) and 26(c) of the Federal Rules of Civil Procedure, objects to Bechtel Corporation and Bechtel Company's First Set of Interrogatories to Plaintiff Consumers Power Company in that to answer said Interrogatories would cause Plaintiff undue annoyance and expense, and be burdensome and oppressive, and Plaintiff requests that this Court enter a Protective Order in connection therewith, all for the following reasons:

1. The Interrogatories total almost five thousand (5,000) questions on 253 pages of legal size paper;
2. Many of the Interrogatories are repetitious;
3. Many of the Interrogatories ask for irrelevant and immaterial information; 8007160 924

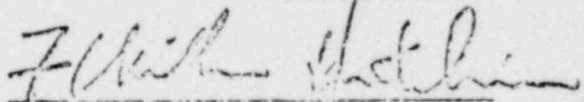
5. The Interrogatories ask for mental impressions of Plaintiff's employees, agents and consultants; ask for legal conclusions; ask for privileged communications between Plaintiff's employees, agents and consultants and its attorneys; and ask for the work product of Plaintiff's attorneys;

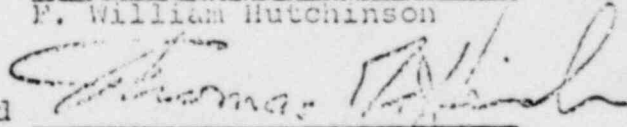
6. The Interrogatories are so framed and intermingled as to make separate and individual objections impracticable; for the Court to consider individual objections to individual Interrogatories would involve great demands on the Court's time;

7. For Plaintiff to prepare answers to these Interrogatories would require undue time and expense, create large quantities of repetitious material, disclose privileged communications between attorney and client, and make public the work product of Plaintiff's attorneys.

This Objection and Motion is based upon the files and records in this case.

VARNUM, RIDDERING, WIERENGO &
CHRISTENSON

By 
F. William Hutchinson

And 
Thomas J. Heiden

Attorneys for Plaintiff
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666 Old Kent Building
Grand Rapids, MI 49502
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Dated: January 15, 1975.