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September 30, 1982

Board Members:

On 9/29/82 I explained the nature of this submission to James Brunner. We discussed whether it should be re-submitted to CPC or submitted directly to the Board as a Motion to Compell.

I agreed with Mr. Brunner's suggestion that it be submitted directly to the Board. And he said that he would not object to it being one day late.

According to this agreement, I submit these changed interrogatories as a Motion to Compell Discovery Responses as they address the same basic issues as the 8/30/82 Interrogatories, but in a manner hopefully more in keeping with the Board's 8/14/82 ruling on contention 1.

Sincerely,

Barbara Stamiris

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cc. OM-OL parties

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