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DOCKET NUMBER 50-445-012
PROD. & UTIL. PROC. 50-446-012

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October 26, 1984

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BY HAND

RELATED CORRESPONDENCE

Ms. Billie Pirner Garde
Trial Lawyers for Public Justice
2000 P Street, N.W.
Suite 611
Washington, DC 20036

Dear Ms. Garde:

I was surprised to receive your October 25 letter regarding our understanding that Mr. Beck might sign the Protective Order. We had had two telephone conversations in which I thought all had been resolved amicably. In that connection, I am afraid you misrecollect, you did not advise me in either telephone conversation, of your unavailability of Tuesday or Wednesday.

More important, at no time, did Mr. Roisman or you raise any substantive objection to Mr. Beck's becoming a signatory to the Protective Order. Rather, you sought to impose a condition that he meet with you and Witness F to discuss his allegations. As I told you, the Protective Order is designed solely to protect Witness F's anonymity--something long since lost; its purpose is not to grant Intervenor (or Applicants) a bargaining tool to extract extraneous concessions. I agreed, however, to the meeting as an accommodation because it seemed a perfectly reasonable request.

Frankly, I did not understand why your letter was at all necessary until I saw that you had sent copies to the Service List. No earlier correspondence was sent to the Service List, nor were our calls of record. What purpose you seek now to advance I do not know, but I am personally disturbed by what appears a "tactic" and believe such practices engender a distrust that places an unnecessary burden on communications between counsel.

Yours truly,

Mark L. Davidson

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