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August 29, 1985

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Mr. Frank Karas
Division of Rules & Records
Room 4210-NMBB
Nuclear Regulatory Commission
Washington, D.C. 20555

Re: May 16, 1985 Freedom of Information Act Request

Dear Mr. Karas:

I am writing you pursuant to our telephone conversation of today regarding the Freedom of Information Act request we filed on May 16, 1985. I have still not received any response from your office, although I understand that you now have the documents in hand. I must emphasize again how important it is for us to receive those documents expeditiously. While we have explained to the court that our Freedom of Information Act request was filed nearly four months ago, the court's patience and willingness to extend discovery in this case has ended. The court has made it clear in no uncertain terms that discovery will be cut off at the close of this month. This causes me great concern because this information is sought in an action involving millions of dollars in alleged damages, and the investigations conducted by the NERC in the 1970's may be crucial to the outcome of the matter.

I understand that you will be reviewing the documents as soon as possible and hope to have them to me sometime next week. If there is anything that I can do to assist you in the review process or expedite the clearance procedures please contact me. If, however, you are unable to get the documents to us next week, I am afraid that we will need to file action to pursue our rights under the Freedom of Information Act. I hope that that course of action will not be necessary, but for reasons beyond my control continued delay is simply not acceptable. Again, please contact

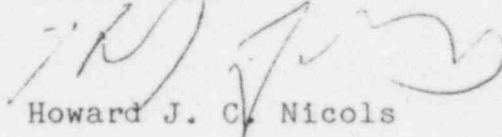
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me if there is anything I can do to expedite disclosure of the material we requested in May.

Sincerely,



Howard J. C. Nicols

HJCN/mac

cc: Keith Kennedy, Esq.
Tom Hermann, Esq.
Kathi Ann Kowalski, Esq.

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