

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO



**CITIZENS FOR ALTERNATIVES
TO RADIOACTIVE DUMPING et al.,**

Plaintiffs,

CIV No. 99-321 ACT/MCA

vs.

**UNITED STATES DEPARTMENT OF ENERGY,
SPENCER ABRAHAM, et al.,**

Defendants.



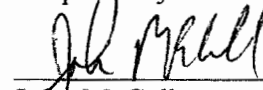
NOTICE OF ORAL DEPOSITION

**TO: Steve Zappe, NMED
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building I
Santa Fe, New Mexico 87505-6303**

PLEASE TAKE NOTICE that Plaintiffs, by and through their attorney, John McCall, will take the Deposition of Steve Zappe upon oral interrogatories before a certified court reporter, Elizabeth Hurst-Waist pursuant to the provisions of F.R.C.P. 26, 30, 32, 34, at the offices of Independent Court Reporters, 500 Oak Street NE Albuquerque, New Mexico on February 10th 2004 commencing at 1:00 p.m. and continuing until 5:00 p.m.

Furthermore, this deposition may be used for all purposes consistent with the applicable rules of Civil Procedure in these proceedings and at trial as set forth in F.R.C.P. 32.

Respectfully Submitted,



John McCall
Attorney for Plaintiffs
405 D Cornell SE
Albuquerque, NM 87106

I hereby certify that a true and correct copy of the foregoing was sent by First Class Mail to Gloria Johnson, counsel for Washington TRU Solutions and mailed to the following, this 28th day of January, 2004:

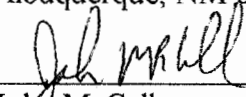
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Raymond Hamilton, AUSA
US Attorney's Office
P.O. Box 607
201 3rd St. NW #900
Albuquerque, New Mexico 87103-0607
(505) 346-7274

Earl Potter, Esq.
Potter & Mills, P.A.
P.O. Box 1208
Santa Fe, NM 87504-1208
(505) 988-8019

Elizabeth Hurst-Waitz
Independent Court Reporters
500 Oak St. NE, Ste. 102
Albuquerque, NM 87106-4738



John McCall
Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
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CITIZENS FOR ALTERNATIVES
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CIV No. 99-321 ACT/MCA

vs.

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Defendants.

SUBPOENA FOR ORAL DEPOSITION

TO: STEVE ZAPPE, NMED
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
505-428-2567

YOU ARE HEREBY COMMANDED TO APPEAR AND TESTIFY AT ORAL DEPOSITION Regarding your knowledge of the Waste Isolation Pilot Plant in Carlsbad, New Mexico.

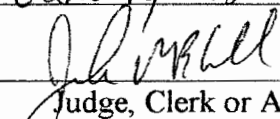
You are commanded to appear as follows:

PLACE: Independent Court Reporters
500 Oak St. NE
Albuquerque, NM 87106-4738

DATE: February 10th 2004 TIME: 1:00 p.m. to: 5:00 p.m.

IF YOU DO NOT COMPLY WITH THIS SUBPOENA you may be held in contempt of court and punished by fine or imprisonment.

January 28, 2004.



Judge, Clerk or Attorney

RETURN FOR COMPLETION BY SHERIFF OR DEPUTY

I certify that on the _____ day of _____, _____, in _____ County, I served this subpoena on _____ by delivering to the person named a copy of the subpoena, a witness fee in the amount of _____ and mileage in the amount of \$_____.

Deputy sheriff

RETURN FOR COMPLETION BY OTHER PERSON MAKING SERVICE

I, being duly sworn, on oath say that I am over the age of eighteen (18) years and not a party to this lawsuit, and that on the _____ day of _____, _____, in _____ County, I served this subpoena on _____ by delivering to the person named a copy of the subpoena, the \$75.00 witness fee and mileage as provided by law in the amount of \$_____.

Person making service

SUBSCRIBED AND SWORN to before me this _____ day of _____, _____ (date).

Judge, notary or other officer authorized to administer oaths

THIS SUBPOENA issued by or at request of:

JOHN MCCALL, ATTORNEY FOR C.A.R.D.

Name of attorney of party

405 D Cornell SE ALBUQUERQUE NM 87106

Address

(505) 256-1998

Telephone

CERTIFICATE OF SERVICE BY ATTORNEY

I certify that I caused a copy of this subpoena to be served on the following persons or entities by (delivery) (mail) on this 28th day of January, 2004:

(1) Steve Zappe

(Name of party)

2905 Rodeo Park Drive East, Building I, Santa Fe, NM 87505-6303

(Address)

(2) _____

(Name of party)

(Address)

John McCall

Attorney

John McCall 1-28-04

Signature and Date of Signature