

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

LAND COURT  
DEPARTMENT OF  
THE TRIAL COURT

CIVIL ACTION NO.  
13 MISC 479028-RBF

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CHRISTINE A. BOSTEK et al. )  
)  
)  
Plaintiffs, )  
)  
v. )  
)  
ENTERGY NUCLEAR GENERATION CO. )  
et al. )  
)  
)  
Defendants. )  

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**[PROPOSED] ORDER REQUIRING ENTERGY TO PRODUCE REQUESTED DOCUMENTS AND TO FURTHER ANSWER INTERROGATORIES.**

As expeditiously as possible, Defendant Entergy Nuclear Generation Co. shall respond to Plaintiffs' Second Request for Production of Documents (RFP) and Third Set of Interrogatories by:

1. Producing all requested documents in the possession of Entergy Corporation and any direct or indirect subsidiary of Entergy Corporation that at any time directly or indirectly owned or operated any of Entergy Corporation's Pilgrim, Vermont Yankee, Fitzpatrick or Indian Point nuclear power stations or ISFSI that Defendant refused to produce on the ground that it was responding to Plaintiffs' RFPs only on behalf of Defendant.
2. Contacting former employees having potentially relevant requested information, and including any information and documents reasonably available from them in

Defendant's RFP responses and interrogatory answers.

3. Producing all documents and answering all interrogatories to include supposed trade secrets that are subject to the protective order.
4. Producing in unredacted form all documents that have been withheld or redacted on the ground that the documents or redactions may contain protectable trade secrets.
5. Producing all documents requested in RFP No. 1 without regard to whether any such documents or information in them was made public.
6. Producing all documents requested in RFPs Nos. 2, 4, 5, and 12-19 that relate to the costs and duration of dry cask spent nuclear fuel storage at any of Entergy Corporation's Pilgrim, Vermont Yankee, Fitzpatrick or Indian Point nuclear power stations.
7. Producing all Boston Edison documents requested in RFPs Nos. 3 and 7-11 that are in the possession of Defendant or that Defendant has the ability to obtain.
8. Providing further answers to Interrogatories Nos. 4-7, 17, 20 and 23 that set forth all facts and identify all documents that support Defendant's contentions and/or denials, without regard to what Defendant intends to rely on at trial.
9. Providing further answers to interrogatories 11, 12, 14 and 15 that include requested information concerning Vermont Yankee.

February \_\_\_, 2015

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Robert B. Foster

Justice