

**FILED**

**12/29/2023**

**9:23 AM**

**U.S. EPA REGION 8  
HEARING CLERK**

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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IN THE MATTER OF )  
 )  
 )  
Leisure Valley, Inc., ) Docket No. SDWA-08-2024-0004  
 )  
 ) **COMPLAINANT'S MOTION**  
Respondent. ) **FOR DEFAULT ON LIABILITY**  
 )  
 )  
(Star Valley RV Park, WY5601471) )

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Pursuant to 40 C.F.R. § 22.17, the Complainant respectfully requests that the Regional Judicial Officer find Respondent Leisure Valley, Inc. (1) in default for failure to file an answer to the Complaint and Notice of Opportunity for Hearing (Complaint) filed in this proceeding and (2) liable for the violations alleged in the Complaint. A memorandum in support of this motion and a proposed order are being filed with this motion.

Respectfully submitted,

**MARGARET  
LIVINGSTON**

Digitally signed by MARGARET  
LIVINGSTON  
Date: 2023.12.28 17:56:07  
-07'00'

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Margaret J. (Peggy) Livingston, Attorney  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 8  
1595 Wynkoop Street  
Denver, CO 80202  
Telephone Number: (303) 312-6858  
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Attorney for Complainant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date indicated below the preceding Motion for Default and the Memorandum in Support of Motion for Default (together with all Attachments listed below) were transmitted by email to [R8\\_Hearing\\_Clerk@epa.gov](mailto:R8_Hearing_Clerk@epa.gov), and that a true copy of each of the foregoing was sent to the following by CERTIFIED MAIL/RETURN RECEIPT REQUESTED, Number 7012 2210 0000 5374 5081:

Nancy J. Brown  
Registered Agent  
Leisure Valley, Inc.  
3910 Muddy String Rd.  
P.O. Box 299  
Thayne, WY 83126

The Attachments to the Memorandum in Support of Complainant's Motion for Default are labeled on the bottom of each page. They are:

1. November 14, 2018 Administrative Order  
(10 pages total, including 2-page cover letter, 4-page order, and 4 pages of attachments)
2. November 1, 2023 email to Regional Hearing Clerk  
(2 pages total, including 1-page email and 1-page attached proof of service for complaint)
3. November 16, 2023 letter to Regional Hearing Clerk  
(3 pages total, including 1-page letter and 1-page attached proof of service for complaint, plus 1-page return receipt card showing Respondent received this letter on 11/24/23)
4. November 29, 2023 letter to Respondent  
(3 pages total, including 2-page letter (without copy of the Complaint that was enclosed with this letter), plus 1-page return receipt card showing Respondent received this letter on 12/8/23)

Date: 12/29/2023

By: Ellen Wells