

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

IN THE MATTER OF:

Palmas Lakes, Inc.  
P.O. Box 191334  
San Juan, Puerto Rico 00919

and

F&R Construction Corporation  
P.O. Box 9932  
San Juan, Puerto Rico 00908

Respondents

Docket No. CWA-02-2007-3410  
Proceeding Pursuant to Section 309(g) of  
The Clean Water Act, 33 U.S.C. §1319(g)  
to Assess Class II Civil Penalties

Harbour Lakes Residencial Development  
NPDES GCP Number PRR10B567

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REGION 2  
2008 JUN -3 AM 11:16  
REGIONAL HEARINGS  
CLERK

**MOTION FOR WITHDRAWAL OF LEGAL REPRESENTATION**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW the undersigned attorney and respectfully states as follows:

1. The undersigned attorney has been legal representative and counsel of record in the instance case for respondents F&R Construction Corporation and Palmas Lakes, Inc.
2. The legal representation of F&R Construction Corporation has been assumed by Sister-Counsel Hilda Quiñones of the law offices of Adsuar Muñiz Goyco Seda & Pérez Ochoa, as has been recently informed by her to the undersigned and to the legal representative of the U.S. EPA in the instance case, Sister-Counsel Silvia Carreño during a recent telephone conference.

possible conflicting situation regarding the individual rights and/or defenses of each respondent.

4. Thus, and in order of not being involved in a conflicting or possibly conflicting situation, the undersigned attorney understands that he has to withdraw his legal representation of both respondents in the instance case.

5. Regarding F&R Construction Corporation, all pleadings, motions, orders and correspondence should be addressed to attorney Hilda Quiñones, Adsuar Muñiz Goyco Seda & Pérez Ochoa, P.S.C., at P.O. Box 70294, San Juan, PR 00936-8294.

6. Regarding Palmas Lakes, Inc. the undersigned does not know who will be assuming the legal representation in the instance case and thus, respectfully request a reasonable period of 30 days to announce new legal representation. In the meantime, and until a new legal representation is announced for Palmas Lakes, Inc. all notifications of orders motions and correspondence should be addressed to Palmas Lakes, Inc., P.O. Box 191334, San Juan, PR 00919.

WHEREFORE, it is respectfully requested from this Honorable Administrative Judge to grant the undersigned attorney's motion to withdraw legal representation and grant Plams Lakes, Inc. a reasonable time period of 30 days to announce new legal representation.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this same date copy of this motion has been mailed by certified mail to Silvia Carreño, Esq., Associate Regional Counsel, Caribbean Programs, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 2, Centro Europa Suite 417, 1492 Ponce de León Ave., San Juan, Puerto Rico 00907-4127; Wanda García, P.E., Chief, Permit Section, Water Quality Division, Environmental Quality Board of PR, P.O. Box 11488, San Juan, PR 00910; and Hilda Quiñones, Esq., Adsuar Muñiz Goyco Seda & Pérez Ochoa, P.S.C., at P.O. Box 70294, San Juan, PR 00936-8294; Karen Maples, Regional Hearing Clerk, US EPA, Region II, 290 Broadway, 17<sup>th</sup> Floor, New York, NY 10007-1866

In Guaynabo, Puerto Rico, this May 27<sup>th</sup>, 2008.



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