



A Professional Limited Liability Company

712 West Broad Street, Suite 4
Falls Church, Virginia 22046
Phone: (202) 591-3239

July 19, 2010

Regional Hearing Clerk
US EPA, Region 4
61 Forsyth St., SW
Atlanta, GA 30303

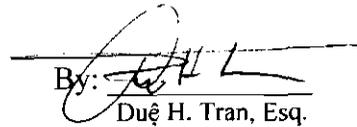
RE: In re VIP Nail Solutions, Inc.
Docet # FIFRA 04-2010-3024

Dear Clerk of the Court:

Please find the enclosed document for filing. Kindly return a file stamp copy via the envelope provided for your convenience.

Yours truly,

DHTLAW, P.L.L.C.

By: 
Duê H. Tran, Esq.

Enclosure

www.DHTLAW.com



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Email: dhtlaw@dhtlaw.com

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HEARING CLERK

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA, GEORGIA

IN THE MATTER OF)	
)	ANSWER &
VIP NAIL SOLUTIONS, INC.)	MOTION FOR CHANGE OF VENUE
RESPONDENT.)	HEARING DEMANDED
)	
_____)	DOCKET NO. FIFRA-04-2010-3024

ANSWER

Corporate Respondent VIP Nail Solution, Inc., through Counsel, answers the Agency's Complaint in like number paragraphs as follows:

1. Denied. Respondent request strict proof thereof that the Agency acquired sample tablets include ingredients regulated by the Agency.
2. Denied. Respondent corporate headquarters is now located in Region 3; specifically, in the States of Maryland. The Respondent asks that the Agency transfers venue to Region 3.
3. Denied. The Respondent corporate address is 7381 Washington Blvd., #106, Elkrigde, Md. 21075.
4. Denied.
5. Admit.
6. This paragraph does not call for an answer.
7. Denied. The Respondent admits that an inspector visited its facility on or about March 6, 2007.
8. Denied. Respondent admits to publishing an advertisement on its website, but the quotes are taken out of context.

9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Admit.
14. This paragraph does not call for an answer.
15. Denied. Respondent denies this paragraph to the extent that it draws for a conclusion of law, and fails to allege facts pertaining to the Respondent.
16. Denied.
17. This paragraph does not call for an answer.
18. Denied. Respondent denies this paragraph to the extent that it draws for a conclusion of law, and fails to allege facts pertaining to the Respondent.
19. Denied. Respondent denies this paragraph to the extent that it draws for a conclusion of law, and fails to allege facts pertaining to the Respondent.
20. Denied. Respondent denies this paragraph to the extent that it draws for a conclusion of law, and fails to allege facts pertaining to the Respondent.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denied.

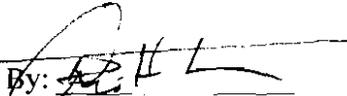
follows in support thereof:

1. The doctrine of *forum non conviens* compels a change in venue in the instant case.
2. Mr. Vinh Tran is the sole shareholder of the Respondent Corporation and both he and the corporation are domiciled in Elkridge, Maryland.
3. The Respondent Corporation has no assets or employees in Georgia.
4. The Respondent Corporation no longer conducts business in Georgia and is a business by name only entity.

WHEREFORE as a matter of convenience with all witnesses and evidence located in the State of Maryland, the Respondent requests that his judicial body grants its Motion to Change Venue to EPA Region 3.

Respectfully submitted,

VIP Nail Solutions, Inc.

By: 
DHTLAW, P.L.L.C.

Duê H. Trần, Esq.
Attorney for Respondent
712 W. Broad St., Ste. 4
Falls Church, VA 22046
Telephone: (571) 499-4335
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**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA, GEORGIA**

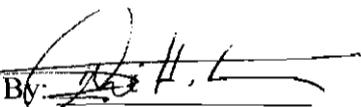
IN THE MATTER OF)	
)	
VIP NAIL SOLUTIONS, INC.)	CERTIFICATE OF SERVICE
RESPONDENT.)	
_____)	DOCKET No. FIFRA-04-2010-3024
)	

The Respondent, through Counsel, certifies that on the 19th day of July 2010 it served on the Agency its Answer, and Motion for Change of Venue via courtesy fax at (202) 565-0044, and through the U.S. postal service to:

Lucia C. Mendez
Associate Regional Counsel
Office of Environment Accountability
U.S. EPA, Region 4
61 Forsyth St., SW
Atlanta, GA 30303

Respectfully,

VIP Nail Solutions, Inc.

By: 
DHTLAW, P.L.L.C.

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