

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2011 MAR 27 P 4: 12  
REGIONAL HEARING  
CLERK

IN THE MATTER OF:

Estancias de Cerro Mar, Inc.

RESPONDENT

MOTION

DOCKET NUMBER CWA-02-2011-3356

NOTICE OF APPEARANCE OF ADDITIONAL COUNSEL  
FOR COMPLAINANT

COMES NOW Complainant, the United States Environmental Protection Agency ("EPA" or the "Agency"), through the undersigned attorney and respectfully alleges, prays and requests, as follows:

On September 23, 2011, Complainant filed an Administrative Complaint in the above captioned matter against the Estancias de Cerro Mar, Inc. ("Respondent") alleging it had violated the Clean Water Act at its Palmas de Cerro Gordo Pump Station located in the Municipality of Vega Alta, Puerto Rico.

The attorney of record for the Complainant is Héctor L. Vélez Cruz, Lead General Attorney and Associate Regional Counsel for Caribbean Programs, in the Office of Regional Counsel of the US Environmental Protection Agency, Region 2.

Complainant hereby requests the Presiding Officer, Helen S. Ferrara, please note of the appearance of the undersigned attorney, Evelyn Rivera-Ocasio, Assistant Regional Counsel, Office of Regional Counsel for Caribbean Programs, US Environmental Protection Agency, Region 2, City View Plaza II, Suite 7000, #48 RD. 165 km 1.2, Guaynabo, PR 00968-8069, phone 787.977.5859 and email [rivera-ocasio.evelyn@epa.gov](mailto:rivera-ocasio.evelyn@epa.gov), as an additional counsel on behalf of the Complainant in this action.

The undersigned counsel certifies that is an active member in good standing of the bar of the Commonwealth of Puerto Rico and that her license to practice law in the named jurisdiction is not

currently lapsed for any reason, including but not limited to retirement, placement in inactive status, failure to pay bar membership fees or failure to complete continuing education requirements.

Accordingly, the undersigned counsel respectfully requests the Presiding Officer to be included via *email* in its notification of all filings in this action, including pleadings, filings, notices, discovery requests and responses, orders, and other papers.

Attorney Héctor L. Vélez Cruz will continue to be the lead attorney for the Complainant in this proceeding.

This motion has been filed today in order to have the Presiding Officer, Helen S. Ferrara, take notice of the above and have the undersigned attorney included as co-counsel with Attorney Héctor L. Vélez Cruz for the Complainant in this action.

This motion was discussed today, March 26, 2014, with Counsels for Respondent, who agreed to the filing of this motion.

Respectfully submitted, in Guaynabo, Puerto Rico this 26<sup>th</sup> day of March of 2014.



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**Evelyn Rivera-Ocasio, Esq.**  
Assistant Regional Counsel  
Office of Regional Counsel for  
Caribbean Programs  
US Environmental Protection Agency,  
Region 2  
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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IN THE MATTER OF:

**Estancias de Cerro Mar, Inc.**

**RESPONDENT**

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**CERTIFICATE OF SERVICE**

I certify that I have this day caused to be sent the foregoing **Notice of Appearance of Counsel**, dated March 26, 2014, and bearing the above-reference docket number, in the following manner to the respective addressees below:

**ORIGINAL AND COPY BY ELECTRONIC MAIL AND UPS TO:**

**Karen Maples, Regional Hearing Clerk**  
Region 2  
U.S. Environmental Protection Agency  
290 Broadway, 16th Floor  
New York, NY 10007-1866  
maples.karen@epa.gov

**COPY BY ELECTRONIC MAIL AND UPS TO:**

**Helen S. Ferrara, Presiding Officer**  
Region 2  
U.S. Environmental Protection Agency  
290 Broadway, 16th Floor  
New York, NY 10007-1866  
ferrara.helen@epa.gov

**COPY TO RESPONDENT BY ELECTRONIC MAIL AND CERTIFIED MAIL, RETURN RECEIPT TO:**

**Edwin R. Cruz, Esq.**  
**Pietrantoní Méndez & Alvarez LLC**  
Attorneys for Respondent  
Popular Center – 19<sup>th</sup> Floor  
208 Ponce de León Avenue  
San Juan, PR 000918  
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**Doira Díaz, Esq.**  
**Pietrantoní Méndez & Alvarez LLC**  
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*March 26, 2014*  
Date

*Edwin R. Cruz*  
NAME