



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

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Ms. LaDawn Whitehead  
Regional Hearing Clerk  
United States  
Environmental Protection Agency-Region 5  
77 West Jackson Blvd. - 19th Fl.  
Chicago, IL 60604-3590

REPLY TO THE ATTENTION OF:  
C-14J

Re: U.S. EPA v. Joseph L. Bollig and Sons, Inc.  
Docket No. CWA-05-2011-0008 - Parties' Joint Motion To Stay Proceedings

Dear Ms. Whitehead:

Enclosed please find an original and one copy of the Parties' Joint Motion To Stay Proceedings in the above-mentioned case. I have served copies of this Motion with the Administrative Law Judge (ALJ) and a copy on Respondent by certified mail, return receipt requested.

Sincerely yours,

Thomas P. Turner  
Assistant Regional Counsel

Enclosure

cc: Hon. M. Lisa Buschmann, ALJ (mail code: 1900L)  
Greg Carlson, Water Division (WW-16J)  
Kevin C. Chow, Assoc. Regional Counsel (C-14J)

Joseph L. Bollig and Sons, Inc.  
c/o: William T. Curran, Esq.  
Curran, Hollenbeck & Orton, SC  
111 Oak Street, PO Box 140  
Mauston, WI 53948-0140

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

<b>In the Matter of:</b>	)	<b>Docket No. CWA-05-2011-0008</b>
	)	
<b>Joseph L. Bollig and Sons, Inc.</b>	)	
<b>New Lisbon, Wisconsin,</b>	)	<b>Parties' Joint Motion To</b>
	)	<b>Stay Proceedings</b>
	)	
	)	<b>Hon. M. Lisa Buschmann</b>
<b>Respondent.</b>	)	<b>U.S. Administrative Law Judge (ALJ)</b>
	)	

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**JOINT MOTION TO STAY PROCEEDINGS**

Come now Complainant, U.S. Environmental Protection Agency, and Respondent, Joseph L. Bollig and Sons, Inc. (together, 'the Parties'), by and through their respective counsel, pursuant to the September 17, 2012 direction of this Court and Rule 22.16 of the Consolidated Rules of Practice (40 C.F.R. § 22.16), and respectfully jointly request that proceedings in the above-captioned case be stayed pending execution of a Consent Agreement and Final Order (CAFO) between the Parties, and for good cause therefore state as follows:

The Parties have successfully achieved equitable and timely resolution of the above-captioned matter. On Monday, September 17, 2012, the Parties informed Ms. Knolyn R. Jones, Legal Staff Assistant to the Court, that they have achieved settlement in principle and are in the process of executing a CAFO. Ms. Jones indicated that the Parties should file this Joint Motion to Stay the Proceedings, and that Complainant should send a copy of the Respondent's CAFO signature page to the attention of this Court upon receipt. The Parties are in the process of performing these tasks.

Prior to filing this Motion, the undersigned contacted the opposing party as to the Joint Motion to Stay Proceedings, and opponent indicated that it does not oppose the Motion and that it may be considered a Joint Filing.

Date: September 20, 2012

Respectfully submitted,



Thomas P. Turner  
Kevin C. Chow  
Counsel for U.S. EPA

cc: U.S. EPA Regional Hearing Clerk

Kevin C. Chow, Esq., U.S. EPA (C-14J)

Greg T. Carlson, U.S. EPA (WW-16J)  
Water Division

Joseph L. Bollig and Sons, Inc.  
c/o: William T. Curran, Esq.  
Curran, Hollenbeck & Orton, SC  
111 Oak Street, PO Box 140  
Mauston, WI 53948-0140

In the Matter of: Joseph L. Bollig and Sons, Inc.  
Docket No. CWA-05-2011-0008

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**CERTIFICATE OF SERVICE**

I hereby certify that today, I filed the original and a copy of the Parties' Joint Motion To Stay Proceedings in the matter cited above with the Office of the Regional Hearing Clerk, (E-19J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, IL 60604-3590. I also promptly mailed a copy of the Parties' Joint Motion To Stay Proceedings via Certified Mail, to:

Joseph L. Bollig and Sons, Inc.  
c/o: William T. Curran, Esq.  
Curran, Hollenbeck & Orton, S.C.  
111 Oak Street, P.O. Box 140  
Mauston, WI 5398-0140

I also mailed a copy of the Parties' Joint Motion To Stay Proceedings to:

Hon. M. Lisa Buschmann, (1900L)  
Administrative Law Judge  
c/o: Ms. Knolyn R. Jones  
Office of the Administrative Law Judges  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, SW  
Washington, D.C. 20460

Date: September 20, 2012



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Thomas P. Turner  
Assoc. Regional Counsel  
U.S. Environmental Protection Agency  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590  
(312) 886-6613