

The Law Offices of  
*Cassandra Collier-Williams, LLC*

*Cassandra Collier-Williams, Esq.*  
*Anthony T. Parker, Esq.*  
*Aaron D. Plasco, Esq.*

**September 21, 2009**

Ms. LaDawn Whitehead  
Regional Hearing Clerk (E-13J)  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

***Re: In The Matter of: Kathryn Y. Lewis-Campbell, Springfield, Ohio***  
***Docket Number: TSCA-05-2009-0004***

Dear Ms. Whitehead:

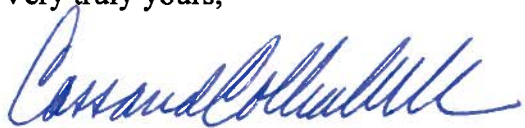
Enclosed please find the original and one (1) copy of the following document, relative to the above captioned matter:

***1. Respondent's Brief In Opposition to Complainant's Motion for Production of Information.***

Please file the above in the normal manner, and return the time stamped copy to me in the enclosed self addressed stamped envelope.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

  
**Cassandra Collier-Williams, Esq.**

CCW: rdc  
Enclosure  
cc: Judge William B. Moran  
Richard R. Wagner  
Kathryn Y. Lewis-Campbell

**RECEIVED**  
SEP 24 2009

**REGIONAL HEARING CLERK  
USEPA  
REGION 5**

**Cleveland Office:**

2103 St. Clair Avenue • 2nd Floor • Cleveland, Ohio 44114 • Phone (216) 621-9190 • Fax (216) 621-9020

**Bratenahl Office:**

Phone (216) 761-3881 • Fax (216) 268-2348 • E-mail: info@lccw.com

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**  
  
**KATHRYN Y. LEWIS CAMPBELL  
SPRINGFIELD, OHIO**  
  
**U.S. EPA ID# OHD 106 483 522**  
  
**RESPONDENT.**

**DOCKET NO. TSCA-05-2009-0004**

**RESPONDENT'S BRIEF IN  
OPPOSITION TO COMPLAINANT'S  
MOTION FOR PRODUCTION OF  
INFORMATION**

**RECEIVED**  
SEP 24 2009

REGIONAL HEARING CLERK  
USEPA  
REGION 5

**I. INTRODUCTION**

**NOW COMES** the Respondent, Kathryn Y. Lewis Campbell, by and through her undersigned counsel, ***The Law Offices of Cassandra Collier-Williams, LLC***, and hereby submits her ***Brief in Opposition to Complainant's Second Motion for Production of Information***. For all the reasons set forth below, the Respondent prays this Honorable Court deny Complainant's Motion.

**II. BRIEF IN SUPPORT**

Respondent takes exception to Complainant's Motion for Production of Information. Respondent takes exception because Complainant is clearly trying to mislead this court as to what financial information was submitted to Complainant. This frivolous motion is another attempt by the Complainant to further harass the Complainant.

On May 26, 2009, Complainant was sent tax returns for 2005, 2006, and

2008. Complainant lied to this court when he represented in his motion that on May 26 he only received Respondent's 2007 tax return. At a later date, the Complainant was sent Respondent's 2007 return, and Respondent's Statement of Financial Affairs.

After receiving more information than was requested initially; specifically the Statement of Financial Affairs, and four years of tax returns, Complainant is demanding more. While getting more documents would be easy for some respondents, it is not for Ms. Lewis-Campbell. First of all, she is the sole guardian and care giver for her two (2) grandchildren. Second, she is disabled and works daily in extreme pain in her back and legs. Third, she must work seven (7) days a week in order to provide for her grandchildren and herself. She has indicated that she is unable to quickly get all pay stubs for 2009. She only works one job, the same job that she worked and that is indicated on her 2008 tax returns. Why Complainant now need pay stubs is nothing but another form of harassment.

Complainant already has Ms. Lewis-Campbell's 2008 signed tax return. Furthermore, if the Complainant already has the tax returns, there is no reason to obtain the tax transcripts.

Ms. Lewis-Campbell asks this court to stop the Complainant from continuously harassing her on this frivolous case. Ms. Lewis-Campbell has no funds to pay an attorney and no funds to pay any fine.

**WHEREFORE**, for the above stated reasons, Respondent Kathryn Y. Lewis-Campbell prays this Honorable Court deny the Complainant's Second Motion for Production of Information.

Respectfully submitted,

**THE LAW OFFICES OF CASSANDRA COLLIER-WILLIAMS, LLC**



**CASSANDRA COLLIER-WILLIAMS, ESQ., #0051951**

**ANTHONY T. PARKER, ESQ., #0068873**

**SARAH R. COFTA, ESQ., #0083653**

P.O. Box 94062

Cleveland, Ohio 44101

(216) 621-9190

(216) 621-9020 (fax)

Counsel for Respondent  
Kathryn Y. Lewis-Campbell

**RECEIVED**  
SEP 24 2009

**REGIONAL HEARING CLERK  
USEPA  
REGION 5**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2009, a copy of the foregoing was delivered via regular U.S. mail to the following:

1. Regional Hearing Clerk (E-13J)  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604
  
2. Richard R. Wagner (C-14J)  
Senior Attorney, Office of Regional Counsel  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

**RECEIVED**  
SEP 24 2009  
REGIONAL HEARING CLERK  
USEPA  
REGION 5

Counsel for Complainant

3. Judge William B. Moran  
U.S. Environmental Protection Agency  
Office of Administrative Law Judges  
1200 Pennsylvania Ave., N.W.  
Mail Code 1900L  
Washington, DC 20005



**CASSANDRA COLLIER-WILLIAMS, ESQ., #0051951**  
**ANTHONY T. PARKER, ESQ., #0068873**  
**SARAH R. COFTA, ESQ., #0083653**

Counsel for Respondent  
Kathryn Y. Lewis-Campbell