

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

IN RE:
Turog Properties, Ltd.

Docket No. CERCLA 03-2019-0111LL

STATUS REPORT

Regarding Turog's availability for a future lien hearing concerning this matter: With Turog's manager having partially recovered from a medical problem, I should be able to meet with him, I hope, in December. November is out, because I am attached for trial on Nov. 17-19, and I would not then be able to meet with Mr. Becker until after the Nov. 26-27 holiday.

I still don't know how to solve the problem of meeting with a 78-yr.-old client, during these COVID times, without jeopardizing his health or mine, in light of the fact that we are not able to meet (not even "virtually" [by electronic means]) to review Turog's documents and the EPA's documents—of which the latter group is voluminous—so as to prepare for a video hearing. Now that Turog's manager could be available to go over the documents with me, to prepare to present its defenses and other positions at the hearing, counsel (the undersigned), as soon as the manager is available for this purpose, will need to meet in person or, in the alternative, will need to devise and construct a way that he and I will be able to review, together, the voluminous documents, so that such attorney-client meetings can, in due course, lead to adequate preparation for the hearing.

If I could please ask for leave to submit another status report in 4 weeks, that would be appropriate and helpful. In the alternative, if the Regional Judicial and Presiding Officer decides, instead, that the meeting/hearing should be assigned a date, I ask that it be scheduled some time after Jan. 15, so that I can refresh any earlier preparation by meeting with my client after my out-of-town trip for the baptism of my new granddaughter, which trip is scheduled for Dec. 24-Jan. 5.

Respectfully submitted,



RONALD L. CLEVER
Attorney for Turog Properties, Ltd.

Date: November 13, 2020