

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

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

April 22, 2009

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 Sir or Madame:

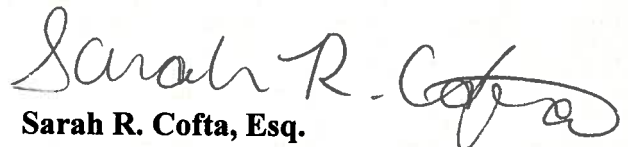
Enclosed please find the original and one (1) copy of the following documents, relative to the above captioned matter:

1. **Motion For Leave To File Amended Answer, Instanter;** and
2. **Amended Answer.**

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,

  
Sarah R. Cofta, Esq.

SRC: rdc  
Enclosures  
cc: Richard R. Wagner, Esq.  
Judge William b. Moran  
Kathryn Y. Lewis-Campbell

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U.S. ENVIRONMENTAL  
PROTECTION AGENCY

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

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

DOCKET NO. TSOA-05-2009-0004

MOTION FOR LEAVE TO FILE  
AMENDED ANSWER, INSTANTER

**NOW COMES** the Defendant, Kathryn Lewis Campbell, by and through her undersigned counsel, **The Law Offices of Cassandra Collier-Williams, LLC**, and hereby requests leave to file *instanter* the attached Amended Answer to the EPA's Complaint (Exhibit "A").

The EPA filed its Complaint on or about February 9, 2009. Defendant filed her Answer on March 18, 2009.

On April 8, 2009, Complainant filed its Motion for Partial Accelerated Decision based on the allegation that "Respondent has waived any claim that she is unable to pay the penalty amount proposed for the violations she is alleged to have committed in the Complaint and Compliance Order" by not raising the issue of her ability to pay the amount of penalty proposed. However, Complainant stated in its Memorandum In Support of Motion for Partial Accelerated Decision on Respondent's Ability to Pay Penalty:

Given that this matter is in its initial stages, should

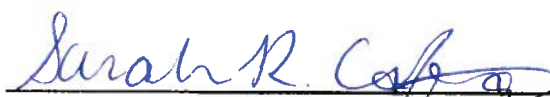
Respondent, in lieu of filing an objection to this motion within the time allowed by rule, see 40 C.F.R. § 22.16(b), file a motion to amend the Answer for the purpose of raising a claim that she does not have an "ability to pay" the penalty amount proposed, Complainant would not object to the motion being granted, and Respondent being allowed an appropriate period of time within which to file an amended answer.

Respondent, therefore, respectfully requests leave to file *instanter* the attached Amended Answer to Complainant's Complaint. Respondent states that no prejudice should result to the parties if this court grants the motion for leave to file this answer.

**WHEREFORE**, for the foregoing reasons, Respondent, Kathryn Lewis Campbell respectfully requests this Honorable Court grant her ***Motion for Leave to File Answer, Instanter.***

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**

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Counsel for Respondent

Kathryn Lewis Campbell

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PROTECTION AGENCY**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 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

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**

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Counsel for Respondent  
Kathryn Lewis Campbell

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