Docket NO: CWA-10-2021-0035, Filed March 18, 2021, US EPA Region 10, Regional Hearing Clerk [Deemed Filed March 1, 2021]

Paul S. Bunt, Esq. PO Box 243, Groveland, CA 95321 (209) 962-6778 paulbunt@goldrush.com

Counsel for Carl Grissom

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

| In the Matter of: |) Docket No. |
|------------------------------|--------------------------|
| O od Orionom por ladicido d |) CWA-10-2021-0035 |
| Carl Grissom, an Individual, |)) MOTION TO DISMISS |
| West Richland, Washington |) |
| |) |
| Respondent. |) |

DEFENDANT'S MOTION TO DISMISS COMPLAINT PURSUANT TO RULE OF CIVIL PROCEDURE 12(b)(1) and 12(b)(6)

Pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6), Respondent Carl Grissom, ("Respondent") hereby move this Court for an Order dismissing the Complaint filed by United State Environmental Protection Agency for lack of subject matter jurisdiction and failure to state a claim. In support of this Motion, Defendant incorporates herein and relies upom the accompanying Memorandum.

WHEREFORE, Defendant requests that the Court enter the proposed Order dismissing Plaintiff's Complaint.

Dated: March 01, 2021

Paul S Bunt