

The Law Offices of
Cassandra Collier-Williams, LLC

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

June 18, 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 Madam:


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 Prehearing Information Exchange, Instantly; and***
- 2. Respondent's Prehearing Information Exchange.***

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: src
Enclosures
cc: Judge William B. Moran
Richard R. Wagner
Kathryn Y. Lewis-Campbell

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**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

**MOTION FOR LEAVE TO FILE
PREHEARING INFORMATION
EXCHANGE, INSTANTER**

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NOW COMES Respondent, Kathryn Y. 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 prehearing information exchange, (attached as Exhibit "A"), pursuant to 40 C.F.R § 22.19, and the Order of the Administrative Law Judge, dated April 17, 2009. The basis for this motion is as follows:

Pursuant to the above-referenced Order by the Administrative Law Judge, dated April 17, 2009, the parties were to simultaneously make their initial prehearing information exchanges by Monday, June 16, 2009. Respondent asserts that due to mistake, error, and excusable neglect, she failed to file her initial prehearing information exchange by June 16, 2009, and seeks to file this information immediately, which is two (2) days beyond the deadline.

Respondent asserts that allowing her to file said information ***instanter*** will not cause any prejudice to the parties, as a minimal amount of time has elapsed

since the deadline, and Respondent has not yet received any prehearing information from the Complainant. Further, should it become necessary, Respondent will not object to any request for an extension of time on behalf of the Complainant, to reply to the Respondent's attached information.

This motion is being made for the above stated reasons only, and not for purposes of undue delay.

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

Respectfully submitted,

THE LAW OFFICES OF CASSANDRA COLLIER-WILLIAMS, LLC



CASSANDRA COLLIER-WILLIAMS, ESQ., #0051951

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Counsel for Respondent
Kathryn Lewis Campbell

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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 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



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Counsel for Respondent
Kathryn Y. Lewis- Campbell

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