

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2011 MAR 24 P 3:01
REGIONAL HEARING
CLERK

IN THE MATTER OF:

Municipality of Culebra
P.O. Box 189
Culebra, Puerto Rico 0075

Parcelas Culebra Lot Development

RESPONDENT

MOTION

DOCKET NUMBER CWA-02-2010-3358

**NOTICE OF APPEARANCE OF ADDITIONAL COUNSEL
FOR COMPLAINANT**

COMES NOW Complainant, the United States Environmental Protection Agency ("EPA" or the "Agency"), through the undersigned attorney and respectfully alleges, prays and requests, as follows:

On September 17, 2010, Complainant filed an Administrative Complaint in the above captioned matter against the Municipality of Culebra (Respondent) alleging it had violated the Clean Water Act at a lot development project located at Villa Muñeca Community in the Municipality of Culebra, Puerto Rico.

The attorney of record for the Complainant is Héctor L. Vélez Cruz, Lead General Attorney and Associate Regional Counsel for Caribbean Programs, in the Office of Regional Counsel of the US Environmental Protection Agency, Region 2.

Complainant hereby requests the Presiding Officer, Helen S. Ferrara, please note of the appearance of the undersigned attorney, Evelyn Rivera-Ocasio, Assistant Regional Counsel, Office of Regional Counsel for Caribbean Programs, US Environmental Protection Agency, Region 2, City View Plaza II, Suite 7000, #48 RD. 165 km 1.2, Guaynabo, PR 00968-8069, phone 787.977.5859 and email rivera-ocasio.evelyn@epa.gov, as an additional counsel on behalf of the Complainant in this action.

The undersigned counsel certifies that is an active member in good standing of the bar of the Commonwealth of Puerto Rico and that her license to practice law in the named jurisdiction is not currently lapsed for any reason, including but not limited to retirement, placement in inactive status, failure to pay bar membership fees or failure to complete continuing education requirements.

Accordingly, the undersigned counsel respectfully requests the Presiding Officer to be included via *email* in its notification of all filings in this action, including pleadings, filings, notices, discovery requests and responses, orders, and other papers.

Attorney Héctor L. Vélez Cruz will continue to be the lead attorney for the Complainant in this proceeding.

This motion has been filed today in order to have the Presiding Officer, Helen S. Ferrara, take notice of the above and have the undersigned attorney included as co-counsel with Attorney Héctor L. Vélez Cruz for the Complainant in this action.

This motion was discussed today, March 21, 2014, with Counsels for Respondent, who agreed to the filing of this motion.

Respectfully submitted, in Guaynabo, Puerto Rico this 21st day of March of 2014.



Evelyn Rivera-Ocasio, Esq.
Assistant Regional Counsel
Office of Regional Counsel for
Caribbean Programs
US Environmental Protection Agency,
Region 2
City View Plaza II, Suite 7000
#48 RD. 165 km 1.2
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CERTIFICATE OF SERVICE

I certify that I have this day caused to be sent the foregoing **Notice of Appearance of Counsel**, dated March 21, 2014, and bearing the above-reference docket number, in the following manner to the respective addressees below:

ORIGINAL AND COPY BY ELECTRONIC MAIL AND UPS TO:

Karen Maples, Regional Hearing Clerk
Region 2
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, NY 10007-1866
maples.karen@epa.gov

COPY BY ELECTRONIC MAIL AND UPS TO:

Helen S. Ferrara, Presiding Officer
Region 2
U.S. Environmental Protection Agency
290 Broadway, 16th Floor
New York, NY 10007-1866
ferrara.helen@epa.gov

COPY TO RESPONDENT BY ELECTRONIC MAIL AND CERTIFIED MAIL, RETURN RECEIPT TO:

Celso Rivera-Flores, Esq.
Counsel for the Municipality of Culebra
PO Box 192084, San Juan P.R. 00919
Phone: (787) 754-1102
Email: crivera@ftorres-viada.com

Beatriz Hernández-Toro, Esq
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Phone: (787) 754-1102
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March 21, 2014

Date

Allen Song

NAME