

From: [Lisa, Joseph](#)
To: [Esposito, Bevin](#)
Subject: Fwd: CERCLA-03-2019-0111LL, entry of appearance
Date: Wednesday, July 22, 2020 5:09:30 PM
Attachments: [letter,2020.07.22,,to,J Lisa \(cc:.A Goldman\).pdf](#)
[ATT00001.htm](#)

Sent from my iPhone

Begin forwarded message:

From: "ronclever@aol.com" <ronclever@aol.com>
Date: July 22, 2020 at 4:52:54 PM EDT
To: "Lisa, Joseph" <Lisa.Joseph@epa.gov>
Cc: "Goldman, Andrew" <Goldman.Andrew@epa.gov>
Subject: CERCLA-03-2019-0111LL, entry of appearance
Reply-To: "ronclever@aol.com" <ronclever@aol.com>

To: Joseph J. Lisa, Esq. - - Regional Judicial and Presiding Officer
- - - - -

Dear Hearing Officer Lisa,

Please *see* the ATTACHED letter.
THANK YOU.

---Ron Clever

---*Ronald L. Clever*
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July 22, 2020

(Sent to: Lisa.Joseph@epa.gov)

Joseph J. Lisa, Esquire
Regional Judicial and Presiding Officer
US EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029Re: Chem-Fab Site
Lien Hearing Docket No. CERCLA-03-2019-0111LL
BRIEF DUE LATER THIS WEEK—Extension Request

Dear Judge Lisa:

I have been retained by Turog Properties, Ltd. to represent them in this matter.

In connection therewith, my client's representative, Heywood Becker, apparently requested of Mr. Goldman documents characterized by him as press reports relating to the public dissemination of information after the response of the EPA at the subject site. Mr. Becker received from Mr. Goldman a digital disc, and, after it has been printed on paper and transmitted to me, it appears that the data received by Mr. Becker were lab reports, and not press reports. As a result, the information sought has not been received, and forms a key defense issue.

My co-counsel was been engaged a little while ago and just now I have been engaged. I am somewhat familiar with the site, having represented the owner in state court; however, I really need an opportunity to become familiar with the federal issues.

I need to bring myself up to speed on this case, so, IN ADDITION TO the matter I have mentioned above (regarding needing the "press reports" and not just the "lab reports") I need to ask for time to get copies of everything in the docket, as well as a copy of the docket itself.

Consequently, I seek postponement of filing of my brief until 30 days after I have received the materials sought above, including my getting a copy of all documents filed in this case so far.

Respectfully submitted,



RONALD L. CLEVER

cc: Andrew S. Goldman, Esq. (Goldman.Andrew@epa.gov)