

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

U.S. EPA-ORC
2009 JUL 27 PM 2: 55

In the Matter of:

CARAM CONSTRUCTION, INC.
1316 Fernández Juncos Ave.
San Juan, PR 00910

RESPONDENT

**LA ALBORADA RESIDENTIAL
DEVELOPMENT**

NPDES Permit Number PRR10BB83

**PROCEEDING TO ASSESS A CLASS II CIVIL
PENALTY**

Proceeding pursuant to Section 309(g) of the
Clean Water Act, 33 U.S.C. §1319(g)

Docket No.: CWA-02-2009-3452

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2009 AUG -3 PM 2: 14:
REGIONAL HEARING
CLERK

**MOTION REQUESTING LEAVE TO WITHDRAW
AS RESPONDENT'S LEGAL REPRESENTATIVE**

TO THE CHIEF ADMINISTRATIVE LAW JUDGE:

NOW COME, the undersigned attorney and very respectfully states and prays as follows:

1. The undersigned attorney was retained by Respondent to represent it in this matter, as stated in Answer to Complaint submitted on June 6th, 2009.
2. On July 10th, 2009, the undersigned attorney was nominated by the Governor of Puerto Rico, Hon. Luis Fortuño, as Associate Member of the Puerto Rico Planning Board. This position requires our total commitment and precludes us from representing private clients before State and Federal Courts and/or Administrative forums.
3. Counsel withdrawal can be accomplished without impeding the administration of justice, efficiency, or functioning of this case, due to the fact that the Answer to Complaint has been timely filed with the Hearing Clerk's Office and the parties have expressed an interest in participating in ADR and/or other informal settlement procedures to find a mutually beneficial solution to this controversy.
4. We respectfully request that Respondent is granted thirty (30) days to retain new

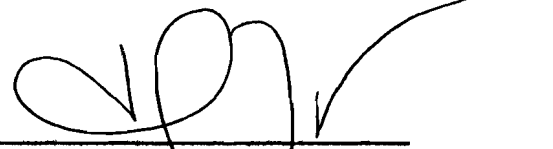
counsel.

5. Counsel for Complainant has been previously notified by phone of our intent to withdraw as counsel.
6. The undersigned has informed Respondent of the status of the case and has delivered the original file to its administrative offices.
7. The last known mailing address that the undersigned has for Respondent is the same address used by the US Environmental Protection Agency to notify Complaint.

WHEREFORE, we pray that the Chief Administrative Law Judge take notice of the foregoing, issues an Order allowing attorney Jennifer Mayo to withdraw as Respondent's legal representative in the instant case, and grants Respondent thirty (30) days to retain new counsel.

RESPECTFULLY SUBMITTED, this 20th day of July, 2009.

I **HEREBY CERTIFY** that on July 20th, 2009, I filed the foregoing with the **Regional Hearing Clerk**, U.S. Environmental Protection Agency, Region 2, 290 Broadway, 16th Floor, New York, New York, 10007-1866, via ~~certified~~^{regular} mail; and sent a copy to **Lourdes del Carmen Rodriguez, Esq.**, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 2, 1492 Ponce De León Ave., Suite 417, San Juan, Puerto Rico 00907-4127.



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