

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

BEFORE THE ADMINISTRATOR

In the Matter of:)
)
 Detroit Renovations, LLC, and) **Docket No. TSCA-HQ-2018-5006**
 Nicole Curtis)
)
 Respondents.)

ANSWER OF DEFENDANT

The Defendant, *Nicole Curtis and Detroit Renovations, LLC*, who answers the complaint of plaintiff, United States Environmental Protection Agency, requests that they provide, to the Defendant whose address is indicated below, copies of any and all relevant written or recorded statements of witnesses, including any statements, diagrams, or drawings made by any representative on any piece of paper or other medium of information storage in regards to the aforementioned Docket No. TSCA-HQ-2018-5006. In addition, the defendant requests other types of discovery to properly assess the case.

This includes, but is not limited to:

- Names and addresses of all persons the Environmental Protection Agency had on-site of Defendant's property.
- Dates and times of all persons the Environmental Protection Agency had on-site.
- Defendant representative whom was contacted on-site during any visitation by the agency.
- Results of any and all tests an Environmental Protection Agency representative conducted on-site.
 - Including the make/model of any testing kits
- Any correspondences with Defendant regarding possible violations during the renovation process.

Nicole Curtis
1350 Lagoon Ave Suite 900
Minneapolis, MN 55408

Thank you.



Signature of Respondent

February 19, 2019

Date

In the matter of Detroit Renovations LLC, and Nicole Curtis
Docket No. TSCA-HQ-2018-5006

Certificate of Service

I hereby certify that the request dated February 19, 2019
was electronically mailed to the parties indicated below.

Copy by Electronic Mail to:
Amos Presler, Attorney Advisor
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. (Mail Code 2249A)
Email: presler.amos@epa.gov

Copy by Electronic Mail to:
Raymond C. Bosch,
Attorney Advisor United States Environmental Protection Agency Region 7
11201 Renner Boulevard Lenexa, Kansas 66219
Email: bosch.raymond@epa.gov

Detroit Renovations LLC.
Nicole Curtis Defendant
1350 Lagoon Ave Suite 900
Minneapolis, MN 55408
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