

Jeffry C. Radding

Attorney at Law

1035 Walnut Street
San Luis Obispo, CA 93401
(805) 546-8541

November 21, 2018

Via fed ex

MARY ANGELES
Headquarters Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
Ronald Reagan Building, Room M1200
1300 Pennsylvania Ave., N.W.
Washington D.C. 20004

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re: **Matter of McNamara Realty**
Docket no. TSCA-09-2018-0007

Dear Ms. Angeles:

Enclosed please find an original and two copies of the "*Preliminary Statement of Respondent McNamara Realty to Complaint and Request for Hearing*" relative to the matter indicated above. Also enclosed please find a stamped return envelope.

Please file this pleading and return one of the copies, conformed, in the envelope provided.

Many thanks for your assistance.

Sincerely,


JEFFRY C. RADDING

1 JEFFRY C. RADDING
2 Attorney at Law - SBN 91835
3 1035 Walnut Street
4 San Luis Obispo, CA 93401
5 tel: (805) 546-8541
6 fax: (805) 541-4269

7 Attorney for: McNamara Realty, Respondent

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8 UNITED STATES
9 ENVIRONMENTAL PROTECTION AGENCY
10 REGION X

11
12 *In re Matter of:*

Docket no. TSCA-09-2018-0007

13
14 McNamara Realty,
15
16 Respondent.

PRELIMINARY STATEMENT
OF RESPONDENT
McNAMARA REALTY

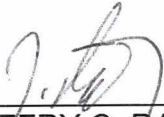
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18
19 Respondent McNamara Realty submits the following Preliminary Statement:

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21 (1) Location of Hearing: It is respectfully requested that San Luis Obispo be
22 designated the location for the hearing. San Luis Obispo is the location of Respondent,
23 and is the location of the many witnesses expected to testify.

24
25 (2) Respondent consents to services of orders and decisions issued by the
26 Tribunal, and to service of documents filed by other parties, by email only during this
27 proceedings.
28

1 (3) The email address to which documents to Respondent are to be served
2 is: radding@msn.com.
3

4
5
6 Dated: November 21, 2018



JEFFRY C. RADDING
Attorney for McNamara Realty
Respondent

Service List

EDGAR P. CORAL
Office of Regional Counsel (ORC-2)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

MARY ANGELES
Headquarters Hearing Clerk
U.S. Environmental Protection Agency
Office of Administrative Law Judges
Ronald Reagan Building, Room M1200
1300 Pennsylvania Ave., N.W.
Washington D.C. 20004

The Honorable Christine Donelian Coughlin
ATTN: Matt Barnwell, Attorney-Advisor
Office of Administrative Law Judges
U.S. Environmental Protection Agency
Ronald Reagan Building, Room M1200
1300 Pennsylvania Ave., N.W.
Washington D.C. 20004

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PROOF OF SERVICE

I, the undersigned, say that I am a citizen of the United States, over eighteen (18) years of age, and not a party to the within entitled action. I am employed at 1035 Walnut Street, San Luis Obispo, California.

On November 21, 2018, I served the foregoing document:

Preliminary Statement of Respondent McNamara Realty

on the following interested parties:

See Service List, attached

(x) **(By Mail - Office)** By placing a true copy thereof in a sealed envelope, with postage prepaid, and by placing said envelope for collection and mailing on said date following ordinary business practices. I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service and said correspondence would be deposited with the United States Postal Service in San Luis Obispo on the said date in the ordinary course of business. *(To Edgar P. Coral)*

() **(By Mail - Deposit)** By placing a true copy thereof in a sealed envelope, with postage prepaid, and by placing said envelope in the United States mail, at San Luis Obispo, CA.

(x) **(By Overnight Delivery)** By Fed Ex or Overnight Mail to the addressee: *(To Headquarters Hearing Clerk and to the Honorable Christine Donelian Coughlin – attn.: Matt Barnwell)*

I declare under penalty of perjury that the foregoing is true and correct, and that this was executed in San Luis Obispo, California on November 21, 2018.



JEFFRY C. RADDING