



Furthermore, if LHP, LLC is found liable, this information does not affect the penalty imposed on LHP, LLC.

4. Exclude any evidence of other properties owned by LHP, LLC. Other properties owned by LHP, LLC are not relevant to this matter for any reason and would only serve to confuse the issues involved in this matter. The fact that LHP, LLC owns no other properties or fifty other properties is not relevant to this matter as this does not increase or decrease the likelihood that LHP, LLC committed the violations alleged. Furthermore, if LHP, LLC is found liable, this information does not affect the penalty imposed on LHP, LLC.
5. Exclude the use of LHP's website. The information contained on the website is not relevant to this matter for any reason and does not increase or decrease the likelihood that LHP, LLC committed the violations alleged. Furthermore, if LHP, LLC is found liable, this information does not affect the penalty imposed on LHP, LLC.

### CONCLUSION

WHEREFORE, Respondent LHP, LLC respectfully request that the Honorable Administrative Law Judge enter an order granting Respondent's Motions in Limine 1, 2, 3, 4 and 5 and for all further and other relief deemed just and equitable.

Respectfully Submitted,

By: /s/ Cynthia Rote  
An Attorney for LHP, LLC

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## CERTIFICATE OF SERVICE

Cynthia M Rote certifies that she caused one original and one copy of LHP, LLC's Motion for Subpoena and Motion in Limine to be served upon the Office of Administrative Law Judges (address below) and one copy to be served upon Complainant (address below) on January 15, 2016, via FedEx.

Sybil Anderson, Headquarters Hearing Clerk  
Office of Administrative Law Judges  
U.S. Environmental Protection Agency  
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Washington, DC 20004

Robert W. Richards, Attorney  
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/s/ Cynthia Rote  
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