

HertzWu, Sara

From: HertzWu, Sara
Sent: Monday, December 16, 2019 9:49 AM
To: Christopher Gallus
Cc: Huston, Liz
Subject: RE: Adamas Construction and Development Services, PLLC, and Nathan Pierce, Docket No. CWA-07-2019-0262

Thank you for the response. If we don't hear otherwise, we will put your position stated below in the motion.

Regards,

Sara Hertz Wu
Senior Counsel
EPA Region VII
11201 Renner Boulevard
Lenexa, Kansas 66219
Phone: (913)551-7316
Email: hertzwu.sara@epa.gov

From: Christopher Gallus <chrisjgalluslaw@gmail.com>
Sent: Monday, December 16, 2019 9:46 AM
To: HertzWu, Sara <HertzWu.Sara@epa.gov>
Cc: Huston, Liz <Huston.Liz@epa.gov>
Subject: Re: Adamas Construction and Development Services, PLLC, and Nathan Pierce, Docket No. CWA-07-2019-0262

Sara,

I did try to reach Nathan, but have not received a response. I'll try again today. If he doesn't get back to me and I haven't responded to you our position will be to oppose, but, again, I'll try to discuss it with him. I just wanted you to have a default position if you needed to move forward. Thanks, CjG

On Mon, Dec 16, 2019 at 7:28 AM HertzWu, Sara <HertzWu.Sara@epa.gov> wrote:

Chris: I wanted to follow-up with you on the amended complaint. We plan to file by COB tomorrow and would like to be able to tell the Court your position. We would like to hear from you, no later than noon mountain time tomorrow. Feel free to contact Liz or me at your convenience.

Regards,

Sara Hertz Wu
Senior Counsel

EPA Region VII

11201 Renner Boulevard

Lenexa, Kansas 66219

Phone: (913)551-7316

Email: hertzwu.sara@epa.gov

From: HertzWu, Sara

Sent: Thursday, December 12, 2019 10:32 AM

To: Christopher Gallus <chrisjgalluslaw@gmail.com>

Cc: Huston, Liz <Huston.Liz@epa.gov>

Subject: RE: Adamas Construction and Development Services, PLLC, and Nathan Pierce, Docket No. CWA-07-2019-0262

Liz's contact information is 913-551-7525, in case you cannot reach me.

From: Christopher Gallus <chrisjgalluslaw@gmail.com>

Sent: Thursday, December 12, 2019 10:15 AM

To: HertzWu, Sara <HertzWu.Sara@epa.gov>

Subject: Re: Adamas Construction and Development Services, PLLC, and Nathan Pierce, Docket No. CWA-07-2019-0262

Hello Sara,

I will try giving you a call. I will talk to Nathan. When is your deadline to amend? Will that occur prior to our filing on 12/20, and does it impact the schedule?

Thanks. I hope you're having a nice day.

Chris

Sent from my iPhone

On Dec 12, 2019, at 8:53 AM, HertzWu, Sara <HertzWu.Sara@epa.gov> wrote:

Chris: I wanted to let you know that EPA plans to file an amended complaint next week. We will file the amended complaint with a motion to amend as required by Part 22. In accordance with the Prehearing Order, I am contacting you to determine whether you have any objection to the filing of an amended complaint. We are not adding any additional counts or increasing the penalty demand. We are adding some additional factual and legal allegations based on the information received from Indian Health Services and your client, which was included in our Prehearing Exchange.

Please let me know as we have to state your position in our motion. If you have any questions, please feel free to give me a call.

Regards,

Sara Hertz Wu

Senior Counsel

EPA Region VII

11201 Renner Boulevard

Lenexa, Kansas 66219

Phone: (913)551-7316

Email: hertzwu.sara@epa.gov

From: Christopher Gallus <chrisgalluslaw@gmail.com>

Sent: Tuesday, December 10, 2019 4:58 PM

To: HertzWu, Sara <HertzWu.Sara@epa.gov>

Subject: Re: Adamas Construction and Development Services, PLLC, and Nathan Pierce, Docket No. CWA-07-2019-0262

Thank you, Sara. I appreciate it. I've not been well recently and I haven't been in contact with Nathan.

Take care,

Chris

On Tue, Dec 10, 2019 at 3:31 PM HertzWu, Sara <HertzWu.Sara@epa.gov> wrote:

Chris: As requested, the orders from the Court.

Regards,

Sara Hertz Wu

Begin forwarded message:

From: "Almase, Jennifer" <Almase.Jennifer@epa.gov>
Date: October 18, 2019 at 10:25:26 AM CDT
To: "HertzWu, Sara" <HertzWu.Sara@epa.gov>, "chrisgalluslaw@gmail.com" <chrisgalluslaw@gmail.com>, "galluslaw@gmail.com" <galluslaw@gmail.com>
Cc: "Angeles, Mary" <Angeles.Mary@epa.gov>
Subject: **Adamas Construction and Development Services, PLLC, and Nathan Pierce, Docket No. CWA-07-2019-0262**

Greetings,

Please find attached two orders issued today in the above-referenced proceeding. As reflected in the certificates of service, you will also be receiving copies of the orders by regular mail.

Best,

Jennifer Almase

Jennifer Almase

Attorney-Advisor | Office of Administrative Law Judges
U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, N.W. | Mail Code 1900R
Washington, D.C. 20460

Telephone: 202-564-1170

Email: almase.jennifer@epa.gov

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