

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

BEFORE THE ADMINISTRATOR

In the Matter of:)	
)	
Taotao USA, Inc.,)	Docket No. CAA-HQ-2015-8065
Taotao Group Co., Ltd., and)	
Jinyun County Xiangyuan Industry)	
Co., Ltd.)	
)	
Respondents.)	

MOTION TO QUASH SUBPOENA

COMES NOW subpoenaed witness Margaret Goldstein, pursuant to Section 22.16(a) of the Consolidated Rules of Practice (40 CFR § 22.16(a)) and respectfully requests that your Honor quash the subpoena sent to me by mail and received on October 10, 2017, and as grounds therefore states the following:

The subpoena was delivered by postal carrier late in the day on October 10, 2017. The subpoena and a printed copy of 40 CFR § 22 were enclosed in the envelope delivered to me. No information regarding travel arrangements or payment for witness fees, airfare, accommodations, per diem, etc. was included.

The subpoena commands that I appear in person at the hearing in Washington, D.C. from Tuesday, October 17 to Friday, October 20, 2017. Given that I reside and work in Orange County, California, travel to Washington, D.C. would need to begin no later than Monday, October 16, 2017. Arranging for a trip of this duration on such short notice presents an extreme hardship to me personally, given my responsibilities at work and to family.

Furthermore, I am at a loss as to why my appearance is desired at the hearing. The company I work for, Harrison Wolf Consulting, provided assistance on a short term project to Taotao USA approximately 5 years ago. This assistance was primarily administrative in nature. We were not retained by the Respondents as certification consultants, and were never authorized to submit applications to the EPA on behalf of the Respondents. 40 CFR § 22.21(b) states "The Presiding Officer may require the attendance of witnesses (...) by subpoena, if authorized under the Act, upon a showing of the grounds and necessity therefore, and the materiality and relevancy of the evidence to be adduced". I am not aware of any information I possess which is material or relevant to the Respondents' claims.

The late date on which the subpoena was delivered does not provide a reasonable amount of time to make arrangements to comply. The lack of payment for witness fees and travel arrangements presents an undue burden to me. As mentioned above, I am also unclear as to why my appearance is requested. The detriment to me and my family from a last minute effort to attend the hearing far outweighs any imagined benefit to the respondents of any testimony I might be able to offer.

For these reasons, I respectfully ask the court to quash the subpoena served to me on October 10, 2017.

10/13/17
Date

Margaret Goldstein
Margaret Goldstein
Harrison Wolf Consulting
17611 Metzler Lane
Huntington Beach, CA 92647

In the Matter of *Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd., Respondents. Docket No. CAA-HQ-2015-8065*

CERTIFICATE OF SERVICE

I certify that the foregoing **Motion to Quash Subpoena**, dated October 13, 2017, was sent this day in the following manner to the addressees listed below:.

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Dated: October 13, 2017


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