

**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.** )

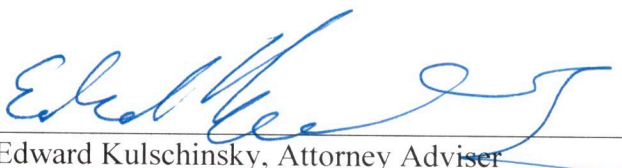
**COMPLAINANT’S RESPONSE TO  
RESPONDENTS’ SECOND MOTION FOR ISSUANCE OF SUBPOENAS**

The Director of the Air Enforcement Division of the U.S. Environmental Protection Agency’s Office of Civil Enforcement (“Complainant”) files this Response to respondents Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd.’s (collectively “Respondents”) Motion for Issuance of Subpoenas (“Motion”), in which Respondents request the issuance of a subpoena to Margaret Goldstein.

Respondents attempted to confer with Complainant’s counsel about whether Complainant would oppose the Motion, but Complainant did not learn of the Motion or Respondents’ efforts until after it had been filed. Complainant does not oppose Respondents’ request that a subpoena be issued to Margaret Goldstein.

Respectfully Submitted,

9/25/2017  
Date

  
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**CERTIFICATE OF SERVICE**

I certify that the foregoing Response to Respondents' Motion for Issuance of Subpoenas in the Matter of Taotao USA, Inc., et al., Docket No. CAA-HQ-2015-8065, was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System.

I certify that three copies of the foregoing Response were sent this day by e-mail to the following e-mail addresses for service on Respondents' counsel: William Chu at [wmchulaw@aol.com](mailto:wmchulaw@aol.com); Salina Tariq at [stariq.wmchulaw@gmail.com](mailto:stariq.wmchulaw@gmail.com); and David Paulson at [dpaulson@gmail.com](mailto:dpaulson@gmail.com).

9/25/2017  
Date



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