

February 19, 2019

Administrator
Environmental Protection Agency
300 Minnesota Ave
Kansas City, KS 66101

The United State Environmental Protection Agency
Plaintiff,
Vs.
Nicole Curtis and Detroit Renovations, LLC
Defendant.

RE: Request for Discovery
Docket No. TSCA-HQ-2018-5006

Dear Administrator,

The above-named Defendant hereby requests that you provide, to the Defendant whose address is indicated below, copies of any and all relevant written or recorded statements of witnesses, including any statements, diagrams, or drawings made by any representative on any piece of paper or other medium of information storage in regards to the aforementioned Docket No. TSCA-HQ-2018-5006. In addition, the defendant requests other types of discovery to properly assess the case.

This includes, but is not limited to:

- Names and addresses of all persons the Environmental Protection Agency had on-site of Defendant's property.
- Dates and times of all persons the Environmental Protection Agency had on-site.
- Defendant representative whom was contacted on-site during any visitation by the agency.
- Results of any and all tests an Environmental Protection Agency representative conducted on-site.
 - Including the make/model of any testing kits
- Any correspondences with Defendant regarding possible violations during the renovation process.

Thank you.

Nicole Curtis
1350 Lagoon Ave Suit 900
Minneapolis MN, 55408