ROXANA FIROUZI
212.453.0777 (direct)
RFIROUZI@GRSM.COM

GORDON&REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA
28TH FLOOR
NEW YORK, NY 10004
PHONE: (212) 269-5500
FAX: (212) 269-5505
WWW.GORDONREES.COM

January 24, 2019

VIA WEBSITE SUBMISSION ONLY
Environmental Protection Agency – Region 8

Re: Betsey P. Hardman and Jody E. Hardman v. Colgate-Palmolive Company, et al.
United States District Court, Southern District of New York
Case No.: 1:18-cv-11223

Dear Sir/Madam:

Please consider the following a formal request pursuant to the Colorado Open Records Law § 24-72-201 et seq., I hereby request a copy of any and all documents, records, correspondence, contracts, reports, logs, test results, permits, citations/violations, hazardous waste disposal manifests, or any other records in any form (written or digital) pertaining to:

W.J. Digby
6015 E 58th Avenue, Commerce City, CO 80022

C. Lazy U Ranch
3640 CO-125, Granby, CO 80446

K. Mart
2400 29th Street, Greeley, CO 80631

Gates Rubber Company
999 S Broadway, Denver, CO 80209

Gates Rubber Company
AT&E Division
1050 South Broadway, Denver, CO 80209

Gates Rubber Company
Power Transmission Division
11715 E. 51st Avenue, Denver, CO 80239

With respect to the locations above, please accept this letter as a request for copies of the following documents specifically during the timeframe of **1965 to present**.

- Any and all records regarding asbestos;
- Any and all records regarding inspections for asbestos;
- Any and all records regarding installation or removal of asbestos;

- Any and all records pertaining to use of asbestos-containing products and asbestos-containing equipment;
- Any and all records regarding policies, procedures, inspection reports, asbestos management plans, and asbestos abatement actions performed pursuant to Asbestos Hazard Emergency Response Act (AHERA), or any other applicable governing authorities, including OSHA;
- Any and all records relating to air testing, or other dust-release testing performed and any and all asbestos analysis data sheets;
- Any and all records relating to asbestos remediation, including those that identify asbestos removal contractors and any contracts or reports for the removal of asbestos; and
- Any and all specification sheets for insulating materials, including but not limited to pipe insulation.

In order to help you to determine my status to assess fees, please note that we are seeking the above information for use in a pending lawsuit. I am willing to pay fees for this request up to a maximum of $100.00. If you estimate that the fees will exceed this limit, please contact me first.

If you deny any part of this request, please cite each specific reason you believe justifies your refusal to release the information and notify me of the applicable appeal procedures available under the law.

If you have any questions regarding the processing of this request, please do not hesitate to contact the undersigned. Thank you for your consideration of my request.

Regards,

Gordon Rees Scully Mansukhani, LLP

Roxana Firouzi
Paralegal