From:	Jaikaran, Bianca
To:	DeGeorge, R. Steven
Subject:	RE: Horton Iron and Metal
Date:	Tuesday, September 4, 2018 4:57:00 PM
Attachments:	image001.png

Ok. Thank you. I'll be in touch.

From: DeGeorge, R. Steven [mailto:SDeGeorge@robinsonbradshaw.com]
Sent: Tuesday, September 4, 2018 4:56 PM
To: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Subject: RE: Horton Iron and Metal

Although I was not involved, the materials I have do indicate that Phillips 66"s counsel took the lead on negotiations for the RI/FS, although the parties had an underlying agreement in place concerning cost sharing. There is no such underlying agreement in place for remedial costs, and I suspect reaching such an agreement is unlikely. I will let you speak with Ms. O'Bryant (presuming you are successful reaching her). I will reach out to Mr. Raney to see what he wants to do.

Thank you.

R. Steven DeGeorge
Robinson Bradshaw

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From: Jaikaran, Bianca [mailto:Jaikaran.Bianca@epa.gov]
Sent: Tuesday, September 04, 2018 4:46 PM
To: DeGeorge, R. Steven
Subject: RE: Horton Iron and Metal

Hi Steven,

I apologize. I mean Horton Iron and Metal and the Estate of Josephine Horton – but I believe the Estate has been administered and ownership in the Site property was transferred to Horton Iron and Metal.

I will contact Mona O'Bryant again. I did leave a message for her about a week ago but I have not heard from her yet.

Previously, Phillips 66 did take the lead on negotiations with EPA on behalf of the group and when I contacted John Horton some time ago he told me that Phillips 66 is taking the lead on everything as far as he knew. He may not have retained counsel for this negotiation.

Thanks,

Bianca N. Jaikaran
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From: DeGeorge, R. Steven [mailto:SDeGeorge@robinsonbradshaw.com]
Sent: Tuesday, September 4, 2018 4:36 PM
To: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Subject: RE: Horton Iron and Metal

I pulled my files to refresh my memory. I'm not sure what you mean by "the Horton Family." On behalf of Phillips 66, I have had dealings with counsel for Horton Iron & Metal ("HI") as well as counsel for The Josephine Horton Estate ("HE"). I have never represented HI or HE, and my guess is that they will continue to be represented by their own counsel. For HI, that's Mona O'Bryant (mona.obryant@smithmoorelaw.com) and for HE that's William Raney (wraney@wessellraney.com). If Ms. O'Bryant and/or Mr. Raney thinks Phillips 66 should be responsible for negotiations with EPA on behalf of their clients, I will be happy to discuss that with one or both of them.

Thank you very much.

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From: Jaikaran, Bianca [mailto:Jaikaran.Bianca@epa.gov]
Sent: Tuesday, September 04, 2018 9:26 AM
To: DeGeorge, R. Steven
Subject: Horton Iron and Metal

Good morning, Steve.

I have been in touch with Brandi Sablatura at Phillips 66 as EPA's contact for the Horton Iron and Metal Site and, as we are nearing negotiations for the RD/RA CD, Brandi has advised that I might ask you if you are the lead on the negotiations for Phillips 66 and the Horton Family together.

I tried to contact Horton's prior attorney from Smith Moore Leatherwood to inquire as to representation of the Horton family but I have not received confirmation yet.

Please advise.

Thank you,

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