From: Bednar, Candace
To: Green, Jamie; Clark, Paul
Subject: SETTLEMENT FW: LHP, LLC status report
Date: Friday, August 21, 2015 7:11:45 AM

Looks like we are going to settle, hopefully before the end of the year.

From: Cynthia Rote [mailto:cindy@delaney-law.com]
Sent: Thursday, August 20, 2015 7:26 PM
To: Richards, Robert
Cc: Johnson, Kent; Bednar, Candace; William Delaney
Subject: RE: LHP, LLC status report

Bob,

I just spoke with my client and we will agree to the settlement number of $8,840. Send me a settlement agreement to review and pending said settlement agreement being acceptable we should be able to close this out.

All the best,
Cindy

Cynthia M. Rote, Esq.
Delaney Law, PC
Managing Partner
444 North Wabash Avenue
Third Floor
Chicago, Illinois 60611
312-276-0263 ext. 201
cynthia@delaney-law.com

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From: Richards, Robert [mailto:Richards.Robert@epa.gov]
Sent: Thursday, August 20, 2015 2:10 PM
To: Cynthia Rote <cindy@delaney-law.com>
Cc: Johnson, Kent <Johnson.Kent@epa.gov>; Bednar, Candace <Bednar.Candace@epa.gov>
Subject: LHP, LLC status report

Cindy,

The Prehearing Order requires that I file a Complainant's Status Report by August 21, 2015. I've not heard anything back since my email to you on August 4, 2015.

The Order did not specify a joint report. Nonetheless, as a courtesy, I'm sharing the proposed language with you in advance of the filing:

"**Comes now Complainant United States Environmental Protection Agency, by and through its Counsel Robert W. Richards, and files this Status Report.**

During the period July 28, 2015 through August 4, 2015, Counsel for Complainant and Counsel for Respondent exchanged offers for settlement via phone call and email. As of August 20, 2015, the parties have not reached agreement to settle the matter."

--Bob

Robert W. Richards, Attorney
U.S. Environmental Protection Agency
11201 Renner Boulevard
Lenexa, Kansas 66219

richards.robert@epa.gov
913/551-7502