

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION

UNITED STATES OF AMERICA and
STATE OF TENNESSEE,

Plaintiffs,

v.

SECURITY SIGNALS, INC.,

Defendant.

Civil Action No. _____

COMPLAINT

The United States of America, by authority of the Attorney General of the United States, acting at the request of the Administrator of the United States Environmental Protection Agency (“EPA”), and the State of Tennessee, by authority of the Attorney General of the State of Tennessee, acting at the request of the Tennessee Department of Environment and Conservation (generally, the “State”), through the undersigned attorneys, file this Complaint and allege as follows:

NATURE OF THE ACTION

1. This is a civil action against Security Signals, Inc. (“SSI” or “Defendant”) for injunctive relief and recovery of costs pursuant to Sections 106 and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (“CERCLA”), 42 U.S.C. §§ 9606 and 9607(a). The State also brings this action against Defendant for injunctive relief pursuant to the Tennessee Hazardous Waste Management Act of 1983 (“HWMA”), Tenn.

Code Ann. §§ 68-212-206 and 68-212-227 and recovery of costs pursuant to Section CERCLA 107(a), 42 U.S.C. § 9607(a).

2. The United States and the State seek: (a) performance of response actions by Defendant at Operable Unit Two (“OU2”) of the National Fireworks Superfund Alternative Site (the “Site”), located in Cordova, Shelby County, Tennessee, consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (“NCP”), 400 C.F.R. Part 300 (as amended); (b) reimbursement of response costs EPA and the Department of Justice incurred related to OU2, together with any accrued interest; (c) reimbursement of response costs the State of Tennessee incurred related to OU2, together with any accrued interest; and (d) a declaratory judgment of liability for response costs that the United States and the State will incur related to OU2.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action and the parties hereto pursuant to 28 U.S.C. §§ 1331, 1345 and 1367, and 42 U.S.C. §§ 9606(a), 9607(a) and 9613(b).

4. Venue is proper in this district pursuant to 42 U.S.C. §§ 9606(a) and 9613(b), and 28 U.S.C. § 1391(b) and (c), because the Site is primarily located, the claims arose, and the threatened and actual releases of hazardous substances that gave rise to these claims occurred within this judicial district.

DEFENDANT

5. Defendant SSI is a Tennessee corporation and a “person” within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21), and Tenn. Code Ann. § 68-212-202(b) of HWMA (incorporating definition from Tenn. Code Ann. § 68-212-104(14)).

6. SSI filed for incorporation in Tennessee in 1948. Its principle place of business from formation through the present is in Cordova, Shelby County, Tennessee.

GENERAL ALLEGATIONS

A. Site History

7. The Site, commonly known as the “Cordova Industrial Park,” consists of approximately 260 acres located inside an active industrial park located off Macon Road in Cordova, Shelby County, Tennessee. The Site is bounded on the north by Macon Road, on the east by Grays Creek, on the south by forested property, on the west by a Tennessee Valley Authority easement, and on the northwest by railroad tracks. The geographic coordinates at the western entrance to the Site are latitude 35° 09' 27.06" north and longitude 89° 45' 41.63" west. EPA organized the Site into two operable units. OU2 covers the north-central portion of the Site consisting of approximately 22 acres located south of Macon Road, along with the full extent of downgradient contamination from that real property including soil, groundwater, and surface water on, around, and below the Site. Operable Unit One (“OU1”) covers the portion of the Site that is not included in OU2.

8. SSI has operated at OU2 since 1948. SSI has owned and operated a portion of OU2 since 1955 and has owned and operated the entire OU2 area since 1993. SSI is the current owner and operator at OU2.¹

9. From 1948 through 1996, SSI’s operations primarily involved manufacturing pyrotechnics, small munitions and incendiary devices, including signals, flares and fuses. SSI

¹ SSI was established in 1948 to manufacture fuses, ignition cartridges and other pyrotechnic devices. Beginning on November 1, 1948, SSI leased for its operations a portion of the Site that is now part of OU2. On June 14, 1955, SSI purchased from National Cordova Corporation approximately 11 acres of the Site, which is now part of OU2. On February 18, 1969, SSI purchased one acre of the adjacent real property, also on what is now part of OU2. On April 23, 1993, SSI purchased approximately ten additional acres on what is now OU2. The 22-acre property currently owned by SSI, along with downgradient soil, sediment, groundwater, and surface water contamination, has been designated as OU2.

also produced other products related to munitions. In 1955, SSI produced hand grenade fuses. From approximately 1955 to 1959, SSI produced die cast parts such as bodies, primer holders, and levers for hand grenades. From approximately 1957 to 1959, SSI made base couplings for firing devices. Starting in 1968, SSI expanded its operations to manufacture screw machine parts and other metal fabrication. From 1996 to the present, SSI's operations have consisted solely of manufacturing screw machine parts, including automobile valves and air conditioning compressor parts.

10. Until 2006, SSI used trichloroethylene ("TCE") in the screw machine part manufacturing process. Specifically, SSI used TCE as a vapor degreaser and as a cleaning agent to remove oil and chips before manufacturing parts into finished products. Upon information and belief, SSI may have used TCE as a cleaning agent and/or degreaser in its other operations at OU2.

11. In 1967 and 1968, SSI also used perchloroethylene ("PCE") in its operations.

12. As a result of SSI's operations, numerous hazardous substances (including but not limited to TCE and PCE) within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), were disposed at the Site.

13. As of the filing of this Complaint, the Site is being addressed as a Superfund Alternative Site. This approach uses the same investigation and cleanup process and standards that are used for sites listed on the National Priorities List ("NPL").

B. Response Actions

14. In 1999, the State conducted a preliminary assessment of the Site that recommended further investigation due to the potential of a release of hazardous substances to ground water, surface water, soil and air pathways.

15. In 2002, EPA performed a Site Investigation to gain a basic understanding of risks posed to human health and/or the environment by releases or threatened releases of hazardous substances from the Site.

16. In 2004 and 2005, EPA conducted an Expanded Site Inspection to further investigate conditions at the Site.

17. EPA conducted a Site-wide soil-gas survey in June 2006 that identified and documented sources of volatile organic compounds (“VOCs”) in the groundwater at OU2.

18. In 2007, SSI entered into a Settlement Agreement and Order on Consent with EPA for a Remedial Investigation/Feasibility Study (“RI/FS”) for OU2. SSI completed the RI/FS on July 29, 2014.

19. In 2008, SSI prepared a Phase I Field Investigation. The Phase I Field Investigation identified five plumes of groundwater contamination (Plume A through Plume E) at the Site.

20. Upon information and belief, the sources of Plumes C, D and E are on SSI’s property, within OU2.

21. The Phase I Field Investigation found PCE and its degradation products² in the soil and groundwater at Plumes C, D and E, and TCE degradation products in soil and groundwater at Plume D.

22. Upon information and belief, the sources of Plumes A and B are not on SSI’s property and are outside the bounds of OU2.

23. In 2009 and 2011, respectively, SSI conducted a Phase II and a Phase III Field Investigation, focusing more in depth on the five plumes of contamination at OU2.

² A degradation product is what a chemical becomes when it begins to break down.

24. In 2010 and 2011, SSI performed two Time Critical Removal Actions (“TCRAs”) pursuant to CERCLA Section 104(a), 42 U.S.C. § 9604(a), at OU2 to excavate contaminated soil and debris and live pin flares and send offsite for disposal.

25. In July 2014, SSI completed the OU2 RI/FS. Of the five possible alternatives, the Proposed Plan recommended phytoremediation, a remedy that involves planting vegetation designed to reduce the presence of contamination at the Site, as the interim remedy for OU2.

26. On September 30, 2014, the EPA issued an interim Record of Decision (“IROD”) in which phytoremediation was selected as the interim remedial action for OU2 in accordance with CERCLA. The IROD addresses Plumes C, D and E of OU2 and identifies VOCs such as TCE, PCE and their degradation products as contaminants of concern.

SPECIFIC ALLEGATIONS

27. The TCE and PCE found at the Site and at OU2 are hazardous substances within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), because they are listed at 40 C.F.R. § 302.4 pursuant to Section 102 of CERCLA, 42 U.S.C. § 9602.

28. The Site and OU2 are each a “facility” within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

29. At all times relevant to this action, there has been a “release” or a “threatened release” of “hazardous substances” into the environment at or from OU2, within the meaning of Sections 101(8), 101(14), 101(22), 104(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9601(8), 9601(14), 9601(22), 9604(a), and 9607(a).

30. As a result of the release or threatened release of hazardous substances at or from OU2, the United States has incurred more than \$267,744.46 in unreimbursed response costs

through April 17, 2018, authorized by Section 104 of CERCLA, 42 U.S.C. § 9604, as defined by Sections 101(23), (24) and (25) of CERCLA, 42 U.S.C. §§ 9601(23), (24) and (25).

31. EPA's response actions taken at or in connection with OU2 and the costs incurred incident thereto are not inconsistent with the NCP.

32. The United States will continue to incur response costs in connection with the Site.

33. The State also has incurred response costs and will continue to incur response costs in connection with the Site.

34. As stated in the IROD, EPA estimates that the remedial action for OU2 will cost approximately \$3.4 million.

35. The IROD is not inconsistent with CERCLA and the NCP, 40 C.F.R. Part 300.

FIRST CLAIM FOR RELIEF
(Injunctive Relief for OU2)

36. Paragraphs 1 through 35 are realleged and incorporated herein by reference.

37. Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), provides in pertinent part:

[W]hen the President determines that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from a facility, he may require the Attorney General of the United States to secure such relief as may be necessary to abate such danger or threat

38. The Regional Administrator of EPA Region 4, through delegated authority, has determined that there is or may be an imminent and substantial endangerment to the public health or welfare or the environment because of actual or threatened releases of hazardous substances into the environment at or from OU2.

39. Pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), and Tenn. Code Ann. §§ 68-212-206(c) and 68-212-227, SSI is liable to the United States and the State for injunctive relief to abate and remedy the conditions at OU2 that may present an imminent and substantial endangerment to public health or welfare or the environment because of an actual or threatened release of hazardous substances at or from OU2.

40. EPA has determined that the interim remedy for OU2 selected in the IROD is necessary to abate the danger or threat at or from Plumes C, D and E at OU2.

41. Therefore, pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), SSI is liable to implement the interim remedial action for OU2 as identified in the IROD, which action EPA has determined is necessary to abate the danger or threat at or from Plumes C, D and E.

SECOND CLAIM FOR RELIEF
(Recovery of United States' Response Costs)

42. Paragraphs 1 through 35 are realleged and incorporated herein by reference.

43. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent part:

Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this section-

* * *

(1) the owner and operator of a vessel or a facility, [and]

(2) any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of

* * *

shall be liable for - -

(A) all costs of removal or remedial action incurred by the United States Government . . . not inconsistent with the national contingency plan;

The amounts recoverable under this section shall include interest on the amounts recoverable under subparagraphs (A) through (D)

44. Pursuant to Section 107(a)(1), 42 U.S.C. § 9607(a)(1), SSI is liable as the current owner and operator of OU2.

45. Pursuant to Section 107(a)(2), 42 U.S.C. § 9607(a)(2), SSI also is liable as the owner and operator of OU2 when the disposal of hazardous substances occurred at OU2.

46. SSI is liable to the United States pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), for unrecovered response costs not inconsistent with the NCP incurred by the United States in connection with OU2, plus any applicable interest on the response costs incurred.

47. The United States will continue to incur response costs at OU2 for, *inter alia*, oversight of the performance and long-term monitoring of the interim remedial action and enforcement costs.

48. Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), provides in pertinent part that in any action for recovery of costs, “the court shall enter a declaratory judgment on liability for response costs or damages that will be binding on any subsequent action or actions to recover further response costs or damages.”

49. Pursuant to Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), the United States is entitled to a declaratory judgment that SSI is liable to the United States under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), for all further response costs not inconsistent with the NCP incurred by the United States in connection with OU2.

THIRD CLAIM FOR RELIEF
(Recovery of State's Response Costs)

50. Paragraphs 1 through 35, 41, 43, and 48 are realleged and incorporated herein by reference.

51. SSI is liable to the State pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), for unrecovered response costs not inconsistent with the NCP incurred by the State in connection with OU2, plus any applicable interest on the response costs incurred.

52. Pursuant to Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), the State is entitled to a declaratory judgment that the Defendant is liable to the State for all further response costs not inconsistent with the NCP incurred by the State in connection with OU2.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, the United States of America and the State of Tennessee, respectfully request that this Court:

A. Order SSI to abate the conditions at OU2 that may present an imminent and substantial endangerment to the public health or welfare or environment, pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), by performing the remedy selected by EPA in the IROD;

B. Award the United States a judgment against SSI pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), for response costs not inconsistent with the NCP incurred by the United States in connection with OU2, plus any accrued interest on the costs;

C. Award the State of Tennessee a judgment against SSI pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), for response costs not inconsistent with the NCP incurred by the State in connection with OU2, plus any accrued interest on the costs;

D. Award the United States a declaratory judgment, pursuant to Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), that SSI is liable to the United States for all future response costs not inconsistent with the NCP to be incurred by the United States in connection with OU2;

E. Award the State of Tennessee a declaratory judgment, pursuant to Section 113(g) of CERCLA, 42 U.S.C. § 9613(g), that SSI is liable to the State for all future response costs, not inconsistent with the NCP, incurred by the State of Tennessee in connection with OU2; and

F. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

FOR THE UNITED STATES OF AMERICA

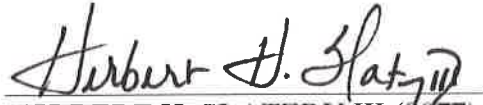
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America and State of Tennessee

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Rachael Amy Kamons, US DOJ, P.O. Box 7611, Ben Franklin Station,
Washington, DC 20044 202-514-5260; Elizabeth P. McCarter, OAG,
P.O. Box 20207, Nashville, TN 37202, 615-532-2582

DEFENDANTS

Security Signals, Inc.

County of Residence of First Listed Defendant Shelby County, TN
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input checked="" type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. 9606, 9607(a), and 9613(g)(2); Tenn. Code Ann. 68-212-206 and 68-212-227

Brief description of cause:

CERCLA and HWMA civil action for injunctive relief, recover response costs, declaratory judgment for future costs

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION DEMAND \$
UNDER RULE 23, F.R.Cv.P.

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

09/15/2020

SIGNATURE OF ATTORNEY OF RECORD

/s/ Rachael Amy Kamons

FOR OFFICE USE ONLY

RECEIPT # _____

AMOUNT _____

APPLYING IFP _____

JUDGE _____

MAG. JUDGE _____