

Apr 23, 2010

**Jim Ruby, Executive Secretary
Environmental Quality Council**

**BEFORE THE
ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

**IN THE MATTER OF THE NOTICE)
)
OF VIOLATION ISSUED TO SALL, LLC) DEQ No. 4626-10
 EQC No. 10-3212A**

SALL’S MOTION TO STRIKE MOTION FOR PROTECTIVE ORDER

SALL, through counsel, moves to strike the Motion for Protective order pertaining the Victoria DeCora deposition upon the following grounds:

1. The Town of Alpine, which has filed the motion through its attorney, is not a party to this matter.
2. The Motion does not represent that it is being filed on behalf of Victoria De Cora.
3. A hearing on the Town’s Motion to Intervene will be conducted May 14, 2010. Until then, the Town is not a proper party to these proceedings, and then only if the motion is granted.
4. This Motion is another example of the Town’s attorney, Mr. Stefan Fodor, to inject himself improperly and prematurely into the matter.
5. This Motion will be supplemented in the event Victoria De Cora does not appear for her deposition scheduled for April 23, 2010.

DATED this 23d day of April, 2010.

/s/ _____
Gary L. Shockey Bar No. 5-1538
Attorney for SALL

CERTIFICATE OF SERVICE

I certify that the above motion was served, via email and U.S. Mail to Tom Flitner, via Jim Ruby, John Corra, and John Burbridge. A courtesy copy has also been sent via email to Stefan Fodor and Richard Rideout, but this should not be construed as an acknowledgment that the Town of Alpine is a proper party to this proceeding.

/s/ _____