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1 2 3 4 5	CHERYL A. LUKE Environmental Enforcement Section Environment and Natural Resources Division U.S. Department of Justice, P.O. Box 7611 Washington, DC 20044-7611 Tel. (202) 514-5466 Fax (202) 616-2427 Virginia State Bar # 26331 E-mail: cheryl.luke@usdoj.gov	
6 7 8 9 10 11 12 13 14	MELINDA HAAG United States Attorney JOANN SWANSON Chief, Civil Division Office of United States Attorney 450 Golden Gate Ave., 11 th Floor San Francisco, CA 94102 Tel. (415)436-7200 DAVINA PUJARI (SBN 183407) CHRISTOPHER D. JENSEN (SBN 235108) Stice & Block LLP 2335 Broadway, Suite 201 Oakland, CA 94162 Tel. (510) 735-0030 Fax (510) 735-0040 Email; dpujari@sticeblock.com; cjensen@sticel	block.com
15 16		
17	IN THE UNITED STATES DISTRICT COURT	
18	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
192021	UNITED STATES OF AMERICA, Plaintiff,	Civil Action No. 3:12-cv-00471-EMC
22	v.	JOINT STIPULATION TO TERMINATE
23	COLUMBUS MANUFACTURING, INC.,	CONSENT DECREE
24	Defendant.	
25		
26		-
27	COME NOW the Parties to this action, the United States of America, and Columbus	
28	Manufacturing, Inc. (CMI) and file this Joint Stipulation To Terminate the Consent Decree	

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entered by this Court on March 14, 2012. Pursuant to the Consent Decree at Section XVII,

Paragraph 75, CMI submitted a Request for Termination of the Consent Decree on January 5,

2015. Pursuant to the Consent Decree at Section XVII, Paragraph 76, the United States and CMI have conferred and have determined that CMI has completed all the requirements of this Consent Decree. Thus, the Parties are submitting for the Court's approval this joint stipulation terminating the Decree pursuant to Paragraph 76 of the Consent Decree.

The parties submit to the Court that CMI has completed the requirements of Section V

The parties submit to the Court that CMI has completed the requirements of Section V (Injunctive Relief) of the Decree, has maintained satisfactory compliance with the Consent Decree for a period of six months following completion of the third-party audits, has paid the civil penalties required of Section IV of the Decree, and has otherwise satisfactorily complied with the requirements for termination of the Consent Decree. The parties request entry of the attached proposed Order approving this Joint Stipulation To Terminate Consent Decree. The parties will be executing separate signature pages for this Joint Stipulation.

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1 2	THE UNDERSIGNED PARTIES enter into this Joint Stipulation To Terminate Consent Decree in the Matter of United States of America v. Columbus Manufacturing, Inc., Civil Action
3	
4	No. 3:12-cv-00471-EMC (N.D. Cal.).
5	FOR PLAINTIFF UNITED STATES OF AMERICA:
6	
7	
8	/s/Cheryl A. Luke CHERYL A. LUKE
9	Environmental Enforcement Section Environment and Natural Resources
10	Division U.S. Department of Justice
11	P.O. Box 7611 Washington, D.C. 20044-7611
12	Phone 202.514.5466
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1	THE UNDERSIGNED PARTIES enter into this Joint Stipulation To Terminate Consent
2	Decree in the Matter of United States of America v. Columbus Manufacturing, Inc., Civil Action
3	
4	No. 3:12-cv-00471-EMC (N.D. Cal.).
5	FOR DEFENDANT COLUMBUS MANUEACTURING INC
6	FOR DEFENDANT COLUMBUS MANUFACTURING, INC.
7	
8	/s/Davina Pujari
9	DAVINA PUJARI Stice & Block LLP
10	2335 Broadway, Suite 201 Oakland, CA 94162
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12	Email; dpujari@sticeblock.com; cjensen@sticeblock.com
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CHERYL A. LUKE 1 **Environmental Enforcement Section** Environment and Natural Resources Division U.S. Department of Justice, P.O. Box 7611 Washington, DC 20044-7611 3 Tel. (202) 514-5466 Fax (202) 616-2427 4 Virginia State Bar # 26331 E-mail: cheryl.luke@usdoj.gov 5 **MELINDA HAAG** 6 **United States Attorney** JOANN SWANSON 7 Chief, Civil Division Office of United States Attorney 8 450 Golden Gate Ave., 11th Floor San Francisco, CA 94102 9 Tel. (415)436-7200 10 DAVINA PUJARI (SBN 183407) CHRISTOPHER D. JENSEN (SBN 235108) 11 Stice & Block LLP 2335 Broadway, Suite 201 12 Oakland, CA 94162 Tel. (510) 735-0030 13 Fax (510) 735-0040 Email; dpujari@sticeblock.com; cjensen@sticeblock.com 14 15 16 IN THE UNITED STATES DISTRICT COURT 17 FOR THE NORTHERN DISTRICT OF CALIFORNIA 18 19 UNITED STATES OF AMERICA. Civil Action No. 3:12-cv-00471-EMC 20 Plaintiff, 21 v. [PROPOSED] ORDER TERMINATING 22 **CONSENT DECREE** 23 COLUMBUS MANUFACTURING, INC., Defendant. 24 25 26 The Court having read the Joint Stipulation to Terminate the Consent Decree entered by 27 28 the Court on March 14, 2012, and the Court being advised that the Defendant has met all

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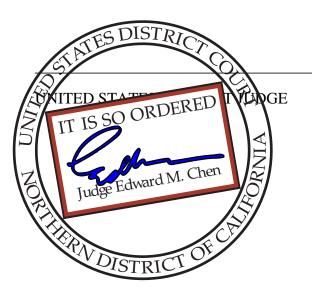
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obligations under the Decree, it is hereby

ORDERED:

That the Consent Decree in this matter is now TERMINATED, and there being no further outstanding issues between the parties, the litigation is hereby DISMISSED with prejudice.

DONE AND ORDERED this $_^{13}$ thy of $_^{February}$, 2015.



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