FOR COURT USE ONLY

S.C. Line #: 18

COURT OF COMMON PLEAS
ENTER
Beth A. Myers
HON. BETH A. MYERS
THE CLERK SHALL SERVE NOTICE TO PARTIES PURSUANT TO CIVIL RULE 58 WHICH SHALL BE TAXED AS COSTS HEREIN.

IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

STATE OF OHIO, *ex rel.*
MICHAEL DEWINE,
OHIO ATTORNEY GENERAL

Plaintiff,

v.

EVANS LANDSCAPING, INC., *et al.*

Defendants.

CASE NO. **A 1303280**

JUDGE **Beth A. Myers**

CONSENT ORDER AND FINAL JUDGMENT ENTRY

ENTERED
NOV 14 2014

D108580978

Plaintiff, the State of Ohio, through its Attorney General, ("the State") filed a Complaint, an Amended Complaint, and a Second Amended Complaint ("Complaints") against Defendants Evans Landscaping, Inc., Evans Gravel, Inc., B.E.E. Holdings Limited Partnership, Broadwell Property Company, LLC, Broadwell Investment Company, LLC, and BRL Development Company, LLC ("Defendants") for alleged violations of R.C. Chapters 3704 and 6111, and the rules promulgated and permits issued thereunder;

The State and Defendants have consented to entry of this Consent Order;

THEREFORE, without trial, admission or determination of any issue of fact or law and upon consent of the Parties hereto, it is ADJUDGED, ORDERED, and DECREED as follows:

I. JURISDICTION AND VENUE

1. The Court has both personal and subject matter jurisdiction over the Parties. The Complaints state a claim upon which relief can be granted, and venue is proper in this Court for the purposes and duration of this Order.

II. PERSONS BOUND

2. The provisions of this Consent Order shall apply to and be binding only upon the State and Defendants, and, to the extent consistent with Civ.R. 65(D), Defendants' officers, agents, servants, employees, successors, and assigns, and those persons in active concert or participation with Defendants under the names that they presently use or any other names they use through any corporate or other devise who receive actual notice of this Consent Order whether by personal service or otherwise.

3. Defendants agree and are hereby enjoined to provide actual notice of this Order to their officers, agents, servants, employees, successors, and assigns, and those persons in active concert or participation with Defendants regarding any activity related to this Consent Order or the Complaints in this case.

III. DEFINITIONS

4. "HCDOES" means the Hamilton County Department of Environmental Services.

5. "Order" refers to this Consent Order.

6. "Director" means the Director of the Ohio Environmental Protection Agency.

7. "Ohio EPA" means the Ohio Environmental Protection Agency.

8. "Emissions unit 1" refers to a Powerscreen Warrior 1800 Screener identified by vehicle identification number ("VIN") PID00123LDGC95672.

9. "Emissions unit 2" refers to a Chieftain 2100 Screener identified by VIN PID00124ADGE58781.

10. "Emissions unit 3" refers to a Peterson Horizontal 6710-B Track Grinder No. 1 identified by VIN 32B-22-1485.

11. "Emissions unit 4" refers to a Peterson Horizontal 6710-B Track Grinder No. 2 identified by VIN 32B-12-1341.

12. "Emissions unit 5" refers to a Peterson Horizontal 4710-B Track Grinder No. 3 identified by VIN 29B-30-1260.

13. "Emissions unit 6" refers to Aggregate Storage Piles at Evans Landscaping Facility, 4229 Round Bottom Road, Cincinnati, Hamilton County, Ohio.

14. "Emissions unit 7" refers to Plant Roadways and Parking Areas at Evans Landscaping Facility, 4229 Round Bottom Road, Cincinnati, Hamilton County, Ohio.

15. "Emissions unit 8" refers to a Mulch Processing Unit including Powerscreen Trommel 830 No. 1 identified by VIN 9202467, Peterson Trommel 830 No. 2 identified by VIN 9200469, Peterson Trommel 830 No. 3 identified by VIN E920564, and a Morbark 830S red trommel No. 4 identified by VIN IC9UP5725SR196001; material handling process; and grinder; all located at Evans Landscaping Facility, 4229 Roundbottom Rd., Cincinnati, Hamilton County, Ohio and/or 3700 Round Bottom Road, Cincinnati, Hamilton County, Ohio.

16. "Emissions unit 9" refers to Unpaved Plant Roadways and Parking Areas at Evans Stoneworks Facility and adjacent properties located at 8361 Broadwell Road, Cincinnati, Hamilton County, Ohio.

17. "Emissions unit 10" refers to Paved Plant Roadways and Parking Areas at Evans Stoneworks Facility and adjacent properties located at 8361 Broadwell Road, Cincinnati, Hamilton County, Ohio.

18. "Emissions unit 11" refers to Aggregate Storage Piles at Evans Stoneworks Facility and adjacent properties located at 8361 Broadwell Road, Cincinnati, Hamilton County, Ohio.

19. "Emissions unit 12" refers to Plant Roadways and Parking Areas at Evans Gravel Facility-Cincinnati, 4455 Mount Carmel Road, Cincinnati, Hamilton County, Ohio.

20. "Emissions unit 13" refers to Aggregate Storage Piles at Evans Gravel Facility-Cincinnati, 4455 Mount Carmel Road, Cincinnati, Hamilton County, Ohio.

21. "Emissions unit 14" refers to Mineral Extraction – Sand and Gravel Extraction at Evans Gravel Facility-Cincinnati, 4455 Mount Carmel Road, Cincinnati, Hamilton County, Ohio.

22. "Emissions unit 15" refers to a Powerscreen 1800 Warrior identified by VIN PID00123CGDG16198 with aggregate handling process.

23. "Emissions unit 16" refers to Roadways and Parking Areas at Evans Gravel Facility-Milford, 4985 Barrett Road, Milford, Clermont County, Ohio.

24. "Emissions unit 17" refers to Aggregate Storage Piles at Evans Gravel Facility-Milford, 4985 Barrett Road, Milford, Clermont County, Ohio.

25. "Emissions unit 18" refers to Aggregate Processing Plant at Evans Gravel Facility – Cincinnati, 4455 Mount Carmel Road, Cincinnati, Hamilton County, Ohio.

26. "Emission unit 19" refers to the portable Horizontal Impactor XH500 identified by VIN PIDXH500LOMC75506.

27. "Emissions unit 20" refers to storage piles for the portable Horizontal Impactor XH500.

28. "Emissions unit 21" refers to unpaved roadways for the portable Horizontal Impactor XH500.

29. All other terms not specifically defined herein, are defined, to the extent applicable, in accordance with the definitions provided in R.C. Chapters 3704 and 6111 and Ohio Adm.Code Chapters 3745-15, 3745-17, 3745-20, 3745-31, 3745-33, 3745-34, 3745-35, 3745-38, 3745-78, and 3745-114.

IV. PERMANENT INJUNCTIVE RELIEF

A. AIR POLLUTION CONTROL

30. Defendants are hereby ordered to comply with R.C. Chapter 3704 and the rules promulgated and permits issued thereunder.

31. Defendants are prohibited from installing, modifying, or operating any emissions unit, air contaminant source, and/or new source without first applying for and obtaining a permit to install and operate, if required, from Ohio EPA.

32. Defendants are ordered to submit permit evaluation reports as required by their permits to install and operate; permits to install; and/or permits to operate.

33. Defendants are ordered to conduct fugitive dust inspections and control fugitive dust as required by their permits to install and operate; permits to install; and/or permits to operate.

34. Defendants are ordered to record fugitive dust inspections as required by their permits to install and operate; permits to install; and/or permits to operate.

35. Within thirty days of the date of the entry of this Order, Defendants agree to submit to HCDOES complete permit to install and operate applications for the emissions units defined in Paragraphs 8 through 28 above. The Director agrees to review and process the applications in accordance with Ohio Adm.Code Chapter 3745-31.

B. WATER POLLUTION CONTROL

36. Evans Landscaping, Inc. ("Evans Landscaping") and B.E.E. Holdings Limited Partnership ("B.E.E.") are hereby ordered to comply with R.C. Chapter 6111 and the rules promulgated and permits issued thereunder.

37. Evans Landscaping and B.E.E. are hereby ordered to submit Discharge Monitoring Reports in accordance with Part III.4.B. of NPDES Permit No. 1IN00298*AD.

38. Evans Landscaping and B.E.E. are hereby ordered to submit annual compost reports by no later than April 1 of each calendar year as required by Part II.I. of NPDES Permit No. 1IN00298*AD. Evans Landscaping and B.E.E. are hereby ordered to submit the annual compost report that was due on April 1, 2014 within 30 days of the entry of this Order.

39. Evans Landscaping and B.E.E. are hereby ordered to report flow rate in accordance with NPDES Permit No. 1IN00298*AD.

40. Evans Landscaping and B.E.E. are hereby ordered to report instances of noncompliance within 24 hours of discovery pursuant to Part III.12. of NPDES Permit No. 1IN00298*AD.

41. Within three months of the date of the entry of this Order, Evans Landscaping and B.E.E. agree to submit to Ohio EPA a complete permit to install application, if necessary, and detailed plans for achieving full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director.

42. Within six months of the date of the entry of this Order, Evans Landscaping and B.E.E. agree to initiate construction in accordance with any Permit to Install in order to achieve full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director.

43. Within fourteen days of initiating construction in accordance with any Permit to Install to achieve full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director, Evans Landscaping and B.E.E. agree to submit written verification to Ohio EPA of Defendants' initial construction.

44. Within twelve months of the date of the entry of this Order, Evans Landscaping and B.E.E. agree to complete construction in accordance with any Permit to Install to achieve full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director.

45. Within fourteen days of completing construction, Evans Landscaping and B.E.E. agree to submit written verification to Ohio EPA of Defendants' construction completion in accordance with any Permit to Install to achieve full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director.

46. Within fourteen months of the date of the entry of this Order, Evans Landscaping and B.E.E. agree to attain full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director.

47. Within fourteen days of attaining full compliance with the final effluent limitations, Evans Landscaping and B.E.E. agree to submit written verification to Ohio EPA of Defendants' attainment of full compliance with the final effluent limitations for outfalls 1IN00298001 and 1IN00298002 in accordance with any permits issued by the Director.

48. Within three months of the date of the entry of this Order, Evans Landscaping and B.E.E. agree to submit to Ohio EPA a complete and approvable Application for Modification of an Ohio NPDES Permit with an Antidegredation Addendum in order to modify the Schedule of

Compliance dates in NPDES permit No. 1IN00298*AD ("the NPDES permit") to be consistent with the dates as agreed upon in Paragraphs 43 through 49 of this Order.

49. Within three months of the date of the entry of this Order, Evans Landscaping and B.E.E. agree to have prepared, implemented, and be in compliance with their Stormwater Pollution Prevention Plan as required in Part IV of the NPDES permit.

50. Within 30 days of the date of entry of this Order, Evans Landscaping and B.E.E. agree to submit a complete, approvable and updated Permit to Install application and detailed plans for installation of the holding tank for sewerage of sanitary waste.

51. Within 30 days of the date of entry of this Order, Evans Landscaping and B.E.E. agree to install proper outfall signage in accordance with the NPDES permit and submit photographs of the properly-installed outfall signage as required by the NDPES permit.

52. Within three months of the date of entry of this Order, Evans Landscaping and B.E.E. agree to provide a plan to Ohio EPA describing how Defendants will attain full compliance with the NPDES permit.

V. SUBMITTAL OF DOCUMENTS

53. All documents relating to air pollution control that are required to be submitted to HCDOES pursuant to this Order shall be submitted to the following address, or to such addresses as HCDOES may hereafter designate in writing:

Hamilton County Department of Environmental Services
Southwest Ohio Air Quality Agency
Attn: Michael Schierloh or his successor
250 William Howard Taft Road
Cincinnati, Ohio 45219.

54. All documents relating to water pollution control that are required to be submitted to Ohio EPA pursuant to this Order shall be submitted to the following address, or to such addresses as Ohio EPA may hereafter designate in writing:

Ohio Environmental Protection Agency
Southwest District Office
Division of Surface Water
Attn: Marianne Piekutowski or her successor
401 East Fifth Street
Dayton, Ohio 45402.

VI. CIVIL PENALTY

55. Pursuant to and in accordance with R.C. 3704.06 and R.C. 6111.09, Defendants are enjoined and ordered to pay a total civil penalty of three hundred thousand dollars ($300,000.00) to the State of Ohio. The civil penalty paid pursuant to this Paragraph shall be paid according to the following conditions:

(a) Defendants shall deliver, within six months of the date of the entry of this Order, a first cashier's or certified check in the amount of thirty thousand dollars ($30,000.00) drawn on an account with sufficient funds made payable to "Treasurer, State of Ohio" delivered to Scott Hainer, or his successor, Paralegal, Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215. "Ohio EPA – Division of Air Pollution Control" shall appear on the face of the check. The Ohio Attorney General's Office may notify Defendants of any late payment. If the Ohio Attorney General's Office notifies Defendants that an installment payment is late, then the total remaining balance, plus interest applicable per R.C. 131.02(D), is due immediately.

(b) Defendants shall deliver, within six months of the date of the entry of this Order, a second cashier's or certified check in the amount of twenty thousand dollars ($20,000.00) drawn on an account with sufficient funds made payable to "Treasurer, State of Ohio" delivered to Scott Hainer, or his successor, Paralegal, Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215. "Ohio EPA – Division of Surface Water" shall appear on the face of the check. The Ohio Attorney General's Office may notify

Defendants of any late payment. If the Ohio Attorney General's Office notifies Defendants that an installment payment is late, then the total remaining balance, plus interest applicable per R.C. 131.02(D), is due immediately.

(c) Defendants shall deliver, within one year of the date of the entry of this Order, a third cashier's or certified check in the amount of fifty thousand dollars ($50,000.00) drawn on an account with sufficient funds made payable to "Treasurer, State of Ohio" delivered to Scott Hainer, or his successor, Paralegal, Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215. "Ohio EPA – Division of Air Pollution Control" shall appear on the face of the check. The Ohio Attorney General's Office may notify Defendants of any late payment. If the Ohio Attorney General's Office notifies Defendants that an installment payment is late, then the total remaining balance, plus interest applicable per R.C. 131.02(D), is due immediately.

(d) Defendants shall deliver, within one and a half years of the date of the entry of this Order, a fourth cashier's or certified check in the amount of fifty thousand dollars ($50,000.00) drawn on an account with sufficient funds made payable to "Treasurer, State of Ohio" delivered to Scott Hainer, or his successor, Paralegal, Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215. "Ohio EPA – Division of Air Pollution Control" shall appear on the face of the check. The Ohio Attorney General's Office may notify Defendants of any late payment. If the Ohio Attorney General's Office notifies Defendants that an installment payment is late, then the total remaining balance, plus interest applicable per R.C. 131.02(D), is due immediately.

(e) Defendants shall deliver, within two years of the date of the entry of this Order, a fifth cashier's or certified check in the amount of fifty thousand dollars ($50,000.00) drawn on an account with sufficient funds made payable to "Treasurer, State of Ohio" delivered to Scott Hainer, or his successor, Paralegal, Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215. "Ohio EPA – Division of Air Pollution Control" shall appear on the face of the check. The Ohio Attorney General's Office may notify Defendants of any late payment. If the Ohio Attorney General's Office notifies Defendants that an installment payment is late, then the total remaining balance, plus interest applicable per R.C. 131.02(D), is due immediately.

(f) Defendants are enjoined and ordered to expend an additional one hundred thousand dollars ($100,000.00) on permanent, natural windbreaks by planting trees on the Defendants' properties within two years of the date of the entry of this Order pursuant to the conditions provided in Paragraphs 55(g), (h), (i), and (j) below.

(g) Within ninety days of the date of the entry of this Order, Defendants are enjoined and ordered to submit to HCDOES a complete, approvable plan detailing the number of trees to be planted by Defendants, the species of trees to be planted by Defendants, the location of the trees to be planted on Defendants' property, dates upon which the tree planting will be commenced and completed, and written estimates of the expenses for the trees and labor.

(h) Defendants shall not plant any trees without written approval from HCDOES. Once Defendants plant trees pursuant to this Section, Defendants shall not remove or otherwise alter any tree planted pursuant to this Section without the written approval of HCDOES.

(i) Within thirty days of the date of completion of the tree planting, as specified in the plan as required by Paragraph 55(g), Defendants shall submit invoices, receipts, and other written evidence of their expenses totaling $100,000.00 to HCDOES.

(j) If Defendants fail to comply with Paragraphs 55(g), (h), (i), and/or any term or condition of the plan submitted to HCDOES pursuant to Paragraph 55(g), Defendants shall immediately pay the State $100,000.00 by cashier's or certified check drawn on an account with sufficient funds made payable to "Treasurer, State of Ohio" delivered to Scott Hainer, or his successor, Paralegal, Ohio Attorney General's Office, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215. "Ohio EPA – Division of Air Pollution Control" shall appear on the face of the check. In the event that Defendants incur any expense in attempting to comply with Paragraph 55(f), Defendants may seek to offset such expense. In order for the State to consider approval for any offsets, Defendants shall submit invoices, receipts, and other written evidence of their attempts to comply with Paragraph 55(f) to HCDOES. The State retains complete discretion in determining whether to approve any offset and the amount of any offset.

VII. STIPULATED PENALTIES

56. *In the event Defendants fail to comply with any requirement or deadline provided in* Paragraphs 31 through 35 and/or Paragraphs 37 through 52 of this Order, Defendants are liable for and shall on their own accord pay stipulated penalties without demand or notice by the State of Ohio in accordance with the following schedule for each failure to comply:

(a) For each day of each failure to comply with any requirement or deadline of this Order up to and including the first thirty (30) days of each failure, five hundred dollars ($500.00) per day for each failure to comply with each requirement or deadline.

(b) For each day of each failure to comply with a requirement or deadline of this Order for days thirty-one (31) through sixty (60) days of each failure, seven hundred fifty dollars ($750.00) per day for each failure to comply with each requirement or deadline.

(c) For each day of each failure to comply with a requirement or deadline of this Order for each day beyond sixty (60) days of each failure, one thousand dollars ($1,000.00) per day for each failure to comply with each requirement or deadline.

57. Any payment required to be made under the provisions of Section VII of this Order shall be made by delivering to the State, care of Scott Hainer or his successor, Paralegal, at the Office of the Ohio Attorney General, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215, a cashier's check or certified check or checks made payable to the order of the "Treasurer, State of Ohio" for the appropriate amount within thirty (30) days from the date of the failure to comply with the requirement or deadline for this Order. The payment of the stipulated penalty shall be accompanied by a letter briefly listing Defendants' names, describing the type of violation, deadline, or requirement not met and the date(s) upon which the violation of this Order occurred.

58. The payment of stipulated penalties by Defendants and the acceptance of such stipulated penalties by the State pursuant to this Section shall not be construed to limit the State's authority

to seek additional relief pursuant to R.C. Chapters 3704 and 6111, including civil penalties under R.C. 3704.06 and R.C. 6111.07 and R.C. 6111.09, or to otherwise seek judicial enforcement of this Order for the same violation for which a stipulated penalty was paid or for other violations.

VIII. SATISIFACTION OF LAWSUIT AND RESERVATION OF RIGHTS

59. Compliance with the terms of this Consent Order shall constitute full satisfaction of any civil liability of Defendants to the State for the claims alleged in the Complaints and for any violation of R.C. Chapters 3704 and 6111 and the rules promulgated and permits issued thereunder up to the date of the Court's entry of this Order.

60. This Order shall not be construed to limit the authority of the State to seek relief for violations not alleged in the Complaints, nor shall this Order bar the State from bringing any action against Defendants for any violations that occur after entry of this Order. The State expressly reserves, and this Order shall be without prejudice to, any claims, demands, rights or causes of action, judicial or administrative, that the State may have or which may in the future apply against Defendants or others, regardless of whether such claim, demand, right, or cause of action was asserted in the Complaints.

61. Nothing herein shall be construed as an admission of guilt, liability or wrongdoing by Defendants nor does this document constitute a waiver of any defense available to Defendants. Further, nothing herein shall be construed to relieve Defendants of their obligations to comply with applicable federal, State, or local statutes, regulations, rules, or ordinances.

IX. MODIFICATION

62. No modification shall be made to this Order without written agreement of the Parties.

X. TERMINATION OF CONSENT ORDER

63. After Defendants have paid all civil penalties, costs, and stipulated penalties, if any, that are or may be due, including but not limited to the completion of all of the requirements in Paragraph 55 of this Consent Order, and so long as Defendants have complied with the injunctive relief terms, conditions, and requirements contained in Section IV of this Consent Order, and so long as Defendants operate in substantial compliance for at least three years from the effective date of this Order, Defendants may move the Court, pursuant to Civ.R. 60(B) to terminate this Order. The State reserves the right to raise objections to any such motion and contest the appropriateness of any such request to terminate the Order. Termination of any or all of the provisions of this Consent Order may also be granted upon joint motion of the parties.

XI. RETENTION OF JURISDICTION

64. The Court will retain jurisdiction of this action for the purpose of administering and enforcing Defendants' compliance with this Order.

XII. COSTS

65. Defendants are hereby ordered to pay the costs of this action.

XIII. ENTRY OF CONSENT ORDER AND JUDGMENT BY CLERK

66. Pursuant to Civ.R. 58, upon the signing of this Order by the Court, the clerk is directed to enter it upon the journal. Within three days of entering the judgment upon the journal, the clerk is directed to serve notice of the judgment upon all parties, including its date of entry upon the journal in the manner prescribed by Rule 5(B) of the Ohio Rules of Civil Procedure and note the service in the appearance docket.

XIV. SIGNATORIES

67. The signatories for Defendants represent that s/he is fully authorized to enter into the terms and conditions of this Order and to legally bind Defendants to this Order.

IT IS SO ORDERED:

ENTER

NOV 12 2014

HON BETH A. MYERS

BETH A. MYERS, JUDGE

Date

APPROVED:

MICHAEL DEWINE,
OHIO ATTORNEY GENERAL

Aaron S. Farmer (0080251)
Trial Attorney for Plaintiff State of Ohio
Assistant Attorney General
Environmental Enforcement Section
30 East Broad Street, 25th Floor
Columbus, Ohio 43215
Telephone: (614) 466-2766
Facsimile: (614) 644-1926
aaron.farmer@ohioattorneygeneral.gov

Clint R. White (0086393)
Christine L. Rideout (0088134)
Of Counsel for Plaintiff State of Ohio
Assistant Attorneys General
Environmental Enforcement Section
30 East Broad Street, 25th Floor
Columbus, Ohio 43215
Telephone: (614) 466-2766
Facsimile: (614) 644-1926
clint.white@ohioattorneygeneral.gov
christine.rideout@ohioattorneygeneral.gov

Attorneys for Plaintiff State of Ohio,
ex rel. Michael DeWine, Ohio Attorney General

April Bott Moore (0066463)
Trial Attorney for Defendants
Bott Law Group, LLC
5126 Blazer Parkway
Dublin, OH 43017
Telephone: (614) 761-2688
Facsimile: (614) 462-1914
abott@bottlawgroup.com

Sarah L. Herbert (0078514)
MacDonald W. Taylor (0086959)
Of Counsel for Defendants
Bott Law Group, LLC
5126 Blazer Parkway
Dublin, OH 43017
Telephone: (614) 761-2688
Facsimile: (614) 462-1914
sherbert@bottlawgroup.com
mtaylor@bottlawgroup.com

Attorneys for Defendants

Evans Landscaping, Inc.

Authorized Representative of Defendant
Evans Landscaping, Inc.

Evans Gravel, Inc.

Authorized Representative of Defendant
Evans Gravel, Inc.

B.E.E. Holdings Limited Partnership

Authorized Representative of Defendant
B.E.E. Holdings Limited Partnership

Broadwell Property Company, LLC

Authorized Representative of Defendant
Broadwell Property Company, LLC

Broadwell Investment Company, LLC

Authorized Representative of Defendant
Broadwell Investment Company, LLC

BRL Development Company, LLC

Authorized Representative of Defendant
BRL Development Company, LLC