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- Counsel for Owner/Operator

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

**IN THE MATTER OF THE BOND FORFEITURE)
QUALITY LANDSCAPE AND NURSERY, INC.) Docket No. 22-4503
LMO ET1496)**

**STIPULATED MOTION TO WAIVE CERTAIN REQUIREMENTS
UNDER WYOMING STATUTE § 35-11-421(c), AND RULES AND REGULATIONS,
DEPARTMENT OF ENVIRONMENTAL QUALITY, CHAPTER 2, SECTION 4(a)(i)**

COME NOW, the State of Wyoming, Department of Environmental Quality (“WDEQ”), by and through its counsel David DeWald, Senior Assistant Attorney General, State of Wyoming, Office of the Attorney General, and Quality Landscape & Nursery, Inc. (“QLN”), by and through its counsel James R. Salisbury, of The Salisbury Firm, P.C., (collectively “Parties”), and hereby stipulate to the following:

1. The Parties stipulate to waive the provisions of Wyoming Statute § 35-11-421(c), insofar as requiring the Council to hold a hearing within thirty (30) days after the receipt of the demand by the operator for a hearing.
2. The Parties further stipulate to waive the certain provision of the Rules and Regulations, Department of Environmental Quality, Chapter 2, Section 4(a)(i), requiring that persons initiating a contested case shall serve the petition by registered mail, return receipt requested.
3. The Parties also stipulate that QLN shall be permitted to serve its petition for a contested case hearing by any provable means of service, including but not limited to Federal Express.

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STATE OF WYOMING

By:



D. David DeWald, #7-5538 (WY)
Senior Assistant Attorney General
WYOMING ATTORNEY GENERAL'S OFFICE
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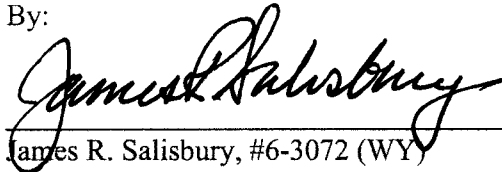
COUNSEL FOR STATE OF WYOMING

4/11/23
Date

QUALITY LANDSCAPE & NURSERY, INC.

Owner/Operator

By:



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COUNSEL FOR OWNER/OPERATOR

11 Apr 2023
Date

CERTIFICATE OF SERVICE

11th I hereby certify that a true and correct copy of the foregoing document was served on the day of April, 2023, to the following via the method indicated below:

David DeWald
Deputy Attorney General
STATE OF WYOMING,
OFFICE OF THE ATTORNEY GENERAL
Water & Natural Resources Division
David.DeWald@wyo.gov
- COUNSEL FOR WYOMING DEPT.
OF ENVIRONMENTAL QUALITY

[] First Class Mail
[] Facsimile
[] Federal Express
[✓] Email – *EQC portal*

Todd Parfitt, Director
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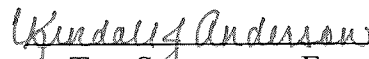
Kyle Wendtland,
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