

COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS  
BOARD OF REGISTRATION OF  
HAZARDOUS WASTE SITE CLEANUP PROFESSIONALS

\_\_\_\_\_  
In the Matter of: )

James J. Decoulos, )

Respondent )

) Docket No.: LSP-10AP-01  
)  
\_\_\_\_\_)

**MOTION TO ADD EXHIBITS**

Now comes the Respondent, James J. Decoulos, who hereby moves to add exhibits to this proceeding to be used solely for the purpose of impeaching Cynthia A. Baran, a witness presented by the Petitioner, the Board of Registration of Hazardous Waste Site Cleanup Professionals (the “Board”).

In support of this motion, Respondent has prepared an affidavit this date (the “Decoulos Aff. #11”) with the proposed exhibits. If this forum approves the addition of the exhibits, the exhibit numbering will commence after the current last Respondent Rebuttal Exhibit, which is now RR-61. See current pleadings and exhibits at <http://decoulos.com/LSPBoard10AP01.htm>

The exhibits sought to be introduced were obtained by Respondent on or about December 15, 2010, after several months of failed attempts. See ¶¶ 1 – 5 of Decoulos Aff. #11.

Respondent seeks to examine Ms. Baran and question why this newly obtained evidence does not further support Respondent’s direct and rebuttal testimony, which stated that the stormwater collection system which discharged into South Meadow Brook was contaminated by surface spills, surface dumping of petroleum products and stormwater flows beginning at the Downgradient Stormwater Inlet in front of property now or formerly owned by Paul Malley, located at 133 Main Street in Carver, Massachusetts. See Exhibit RR-8.

For the foregoing reasons, Respondent moves that Exhibits A through E presented in Decoulos Aff. #11 be introduced into the record to allow Respondent an opportunity to impeach the Board's witness.

Dated: January 18, 2011

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James J. Decoulos". The signature is fluid and cursive, with the first name "James" and last name "Decoulos" clearly distinguishable.

James J. Decoulos *pro se*  
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## STATEMENT OF SERVICE

I, James J. Decoulos, do hereby certify that I caused a copy of the MOTION TO ADD EXHIBITS with the supporting AFFIDAVIT OF JAMES J. DECOULOS, which includes EXHIBITS A through E dated January 18, 2011 to be served on the following parties by electronic mail:

Anne Hartley, Case Administrator                      OADR  
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Lynn Peterson Read, Esq.                              BOARD  
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Signed under the penalties of perjury this 18<sup>th</sup> day of January, 2011.



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