

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)

) LSP Board Complaint No. 05C-07
) OADR Docket No.: LSP-10AP-01
)
)

RESPONDENT’S MOTION TO EXTEND THE EFFECTIVE DATE OF FINAL ORDER

Now comes the Respondent, James J. Decoulos, who moves to extend the effective date of Final Order 05C-07 dated February 8, 2019 by the Board of Registration of Hazardous Waste Site Cleanup Professionals (the “Board”) for an additional period of 15 days. The effective date, as defined on page 10 of the Final Order, would change from 30 days (or Sunday, March 10, 2019) to 45 days (or Monday, March 25, 2019) from the date of the Final Order.

The reason for the motion is that Respondent had a total knee replacement on February 5, 2019. Respondent is slowly recovering from his medical procedure and is unable to work at his office. He is currently on narcotics and not able to work normally. Attached is a copy of instructions from the Brigham and Women’s Hospital which verifies the procedure.

Dated: February 12, 2019

Respectfully submitted,



James J. Decoulos *pro se*
Decoulos & Company, LLC
185 Alewife Brook Parkway
Cambridge, MA 02138
jamesj@decoulos.com
(617) 489-7795

Why you were in the hospital

Your principal diagnosis was: Primary Osteoarthritis of Left Knee

Your diagnoses also included: Osteoarthritis, Knee

Surgeries this admission

Past Procedures (2/5/2019 to Today)

Date	Procedures	Providers
2/5/2019	Left Arthroplasty Total Knee With Custom Implant	Fitz, Wolfgang

Pending Results

None

Please go over any pending results with your doctor at your next appointment. (Please refer to the "Person to Call" section for your doctor's contact information). Results pending at discharge include all non-finalized results from this admission date through the discharge date.

Allergies

No active allergies

PCP and Center

Primary Care Provider	Phone	Center
Heng Soon Tan, MD	617-796-7170	BWH Newton Corner 272 Centre St

Advance Care Planning

Code Status at Discharge: Full Code (Presumed)

Type of Advance Care Directive(s): None

Does patient have a Health Care Proxy form completed?: Patient declines

Health Care Agents

There are no Health Care Agents on file.

Instructions

James Decoulos

You underwent a left total knee replacement with Wolfgang Fitz, MD on 2/5/2019.

Pain Management:

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_____)	
In the Matter of:)	
)	
James J. Decoulos,)	LSP Board Complaint No. 05C-07
Respondent)	OADR Docket No.: LSP-10AP-01
_____)	

**RESPONDENT'S NOTICE OF APPEAL
AND MOTION TO DELAY ANNOUNCEMENT OF FINAL ORDER**

Now comes the Respondent, James J. Decoulos, who hereby notifies the Board of Registration of Hazardous Waste Site Cleanup Professionals (the "Board") that he will be appealing Final Order 05C-07 dated February 8, 2019 to the Superior Court. Respondent intends to file a complaint against the Board, a motion to stay the final order and a motion for a preliminary injunction.

Until the Superior Court issues its decision on the stay and preliminary injunction, Respondent moves that the Final Order be withheld from public release. Given the fact that the complaint was first filed by Respondent's former client nearly fourteen years ago, there will be no harm to the environment, public health or the Board if a public announcement is temporarily delayed. The irreparable harm that Respondent will suffer from a public announcement greatly outweighs a temporary stay.

Dated: February 12, 2019

Respectfully submitted,



James J. Decoulos *pro se*
Decoulos & Company, LLC
185 Alewife Brook Parkway
Cambridge, MA 02138
jamesj@decoulos.com
(617) 489-7795

STATEMENT OF SERVICE

I, James J. Decoulos, do hereby certify that I caused a copy of the RESPONDENT'S MOTION TO EXTEND THE EFFECTIVE DATE OF FINAL ORDER and the NOTICE OF APPEAL AND MOTION TO DELAY ANNOUNCEMENT OF FINAL ORDER to be served on the following party by electronic mail:

Beverly Coles-Roby
Board of Registration of
Hazardous Waste Site Cleanup Professionals
beverly.robby@state.ma.us

BOARD

Signed under the penalties of perjury this 12th day of February, 2019.



James J. Decoulos
Decoulos & Company, LLC
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Cambridge, MA 02138
jamesj@decoulos.com
(617) 489-7795