

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHEMTURA CORPORATION, GREAT LAKES	: Case No. 10 Civ. _____
CHEMICAL CORPORATION, ISCI, INC., KEM	
MANUFACTURING CORPORATION AND	: Chapter 11
NAUGATUCK TREATMENT COMPANY,	
	: Bankr. Case No. 09-11233 (REG)
Plaintiffs,	
v.	: Adversary Proceeding No. 09-1719
	: (REG)
UNITED STATES OF AMERICA, STATE OF	: <u>ECF CASE</u>
CONNECTICUT, STATE OF FLORIDA, STATE	
OF NEW JERSEY, STATE OF NEW YORK,	:
STATE OF NORTH CAROLINA,	
COMMONWEALTH OF PENNSYLVANIA,	:
UNITED STATES ENVIRONMENTAL	
PROTECTION AGENCY, SANTA ANA	:
REGIONAL WATER QUALITY CONTROL	
BOARD, CALIFORNIA DEPARTMENT OF	:
TOXIC SUBSTANCES CONTROL,	
CALIFORNIA STATE WATER RESOURCES	:
CONTROL BOARD, CONNECTICUT	
COMMISSIONER OF ENVIRONMENTAL	:
PROTECTION, FLORIDA DEPARTMENT OF	
ENVIRONMENTAL PROTECTION,	:
NEW JERSEY DEPARTMENT	
OF ENVIRONMENTAL PROTECTION,	:
ADMINISTRATOR OF NEW JERSEY SPILL	
COMPENSATION FUND, NEW YORK	:
DEPARTMENT OF ENVIRONMENTAL	
CONSERVATION, NORTH CAROLINA	:
DEPARTMENT OF ENVIRONMENT AND	
NATURAL RESOURCES, NORTH CAROLINA	:
DIVISION OF WASTE MANAGEMENT and	
PENNSYLVANIA DEPARTMENT OF	:
ENVIRONMENTAL PROTECTION,	
	:
Defendants.	
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NOTICE OF MOTION FOR WITHDRAWAL OF THE REFERENCE



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STATE OF CALIFORNIA ACTING BY
AND THROUGH THE CALIFORNIA
DEPARTMENT OF TOXIC SUBSTANCES
CONTROL, THE STATE WATER
RESOURCES CONTROL BOARD, THE
REGIONAL WATER QUALITY CONTROL
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NOTICE OF MOTION FOR WITHDRAWAL OF THE REFERENCE

PLEASE TAKE NOTICE that upon this notice of motion, the Declaration of Lawrence H. Fogelman, dated January 21, 2010, and exhibits attached thereto, and the accompanying memorandum of law, the United States of America, acting on behalf of the Environmental Protection Agency, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, and the State of Connecticut, the State of New York, the State of North Carolina, the Santa Ana Regional Water Quality Control Board, the California Department of Toxic Substances Control, the California State Water Resources Control Board, the Connecticut Commissioner of Environmental Protection, the Florida Department of Environmental Protection, the New York Department of Environmental Conservation, the North Carolina Department of Environment and Natural Resources, the North Carolina Division of Waste Management, and the Pennsylvania Department of Environmental Protection, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to 28 U.S.C. §157(d) and Federal Rule of Bankruptcy Procedure 5011 withdrawing the reference from the United States Bankruptcy Court for the Southern District of New York to the United States District Court for the Southern District of New York of Debtors' First Amended Complaint filed in this Adversary Proceeding, as well as for such other relief as the Court deems just and proper. Responsive papers shall be filed pursuant to a schedule to be determined by the Court.

Dated: January 21, 2010
New York, New York

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United States Attorney for the
Southern District of New York

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REGIONAL WATER QUALITY CONTROL BOARD,
SANTA ANA REGION

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