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*Attorneys for Plaintiffs*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

**People of the State of California ex rel.  
Attorney General Kamala D. Harris in her  
independent capacity, and the State Water  
Resources Control Board,**  
  
Plaintiffs,  
  
v.  
  
**E2C Remediation, LLC, et al.,**  
  
Defendants.

07AS04626

**STIPULATION RE: MOTION TO  
ENFORCE JUDGMENT AND  
MODIFICATION OF STIPULATED  
JUDGMENT**

Dept.: 54, Hon. Shelleyanne Chang

Action Filed: October 11, 2007  
Judgment Entered: February 26, 2010

WHEREAS, on February 26, 2010, this Court entered a Stipulated Judgment against defendants Environmental Engineering, Consulting and Remediation, Inc., aka E2C Remediation, Philip Goalwin, and Debbie Goalwin (E2C Defendants), among others;

WHEREAS, the Stipulated Judgment includes a civil liability of \$150,000 against the E2C Defendants, stayed for a period of three years, pending compliance with certain injunctive relief terms of the judgment;

1           WHEREAS, on August 21, 2012, plaintiff State Water Resources Control Board (State  
2 Water Board) filed a Motion to Enforce Stipulated Judgment against the E2C Defendants, asking  
3 the Court to impose the \$150,000 civil liability;

4           WHEREAS, the E2C Defendants expressly deny fault or liability for any purported failure to  
5 comply with the terms of the stayed penalty; and the parties having met through their counsel,  
6 have reached agreement to resolve and compromise the disputed issues raised by the Motion to  
7 Enforce Stipulated Judgment, and hereby agree, without admitting any wrongdoing, to entry of an  
8 order modifying the Stipulated Judgment, without any adjudication of any claim, as follows:

9           THEREFORE, the parties agree and stipulate that the Judgment entered in this matter dated  
10 February 26, 2010, is modified as followed:

11           1. Paragraph 3.(e) is replaced in its entirety with the following:

12           “The E2C Defendants shall pay a civil liability to the State Water Resources Control Board  
13 in the amount of \$75,000, due within 60 days of the date that this Stipulation is signed by the  
14 parties.”

15           2. Paragraph 4 is deleted, effective on the date that this Stipulation is signed by the parties.  
16 By deleting Paragraph 4, the parties intend the injunction set forth in said paragraph be dissolved  
17 in its entirety and of no force and effect.

18           3. Paragraph 9 is replaced in its entirety with the following:

19           “Plaintiffs’ Release of E2C Defendants

20           “Except as provided in Paragraph 10, Plaintiff shall and does release, discharge and covenant  
21 not to sue or take administrative action against the E2C Defendants for matters covered. ‘Matters  
22 covered’ are the causes of action alleged in the Complaint in this matter and the purported false,  
23 fraudulent and/or misleading submittals enumerated in the Motion to Enforce Stipulated  
24 Judgment.”

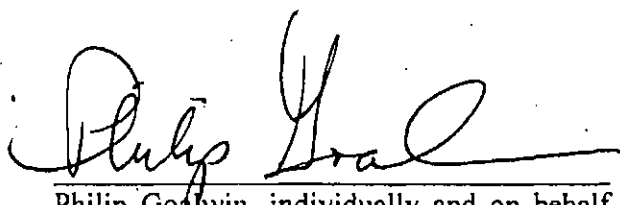
25           4. Paragraph 15 is modified as follows:

26           Each party is to bear its own costs and attorneys’ fees with respect to the underlying action,  
27 the Stipulated Judgment, the Motion to Enforce Stipulated Judgment, and this order modifying  
28 the Stipulated Judgment.

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IT IS SO STIPULATED.

Dated: 1/7, 201<sup>P.H.</sup><sub>13</sub>



Philip Goalwin, individually and on behalf of  
Environmental Engineering Consulting &  
Remediation, Inc., dba E2C Remediation

Dated: 1/7, 201<sup>DEC</sup><sub>13</sub>



Debbie Goalwin, individually and on behalf of  
Environmental Engineering Consulting &  
Remediation, Inc., dba E2C Remediation

Dated: \_\_\_\_\_, 2012

State Water Resources Control Board  
By: Thomas Howard  
Its: Executive Director

APPROVED AS TO FORM:

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Russell B. Hildreth  
Deputy Attorney General  
Attorney for Plaintiffs

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Amy Maclear  
Gordon & Rees  
Attorney for Defendants Philip Goalwin,  
Debbie Goalwin, Environmental Engineering  
Consulting & Remediation, Inc., dba E2C  
Remediation

IT IS SO ORDERED:

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Hon. Shelleyanne W.L. Chang  
Superior Court Judge

1 IT IS SO STIPULATED.

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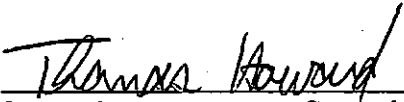
Dated: \_\_\_\_\_, 2012

Philip Goalwin, individually and on behalf of  
Environmental Engineering Consulting &  
Remediation, Inc., dba E2C Remediation

Dated: \_\_\_\_\_, 2012

Debbie Goalwin, individually and on behalf of  
Environmental Engineering Consulting &  
Remediation, Inc., dba E2C Remediation

Dated: 12/5, 2012

  
\_\_\_\_\_  
State Water Resources Control Board  
By: Thomas Howard  
Its: Executive Director

APPROVED AS TO FORM:

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Russell B. Hildreth  
Deputy Attorney General  
Attorney for Plaintiffs

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Amy Maclear  
Gordon & Rees  
Attorney for Defendants Philip Goalwin,  
Debbie Goalwin, Environmental Engineering  
Consulting & Remediation, Inc., dba E2C  
Remediation

IT IS SO ORDERED:

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Hon. Shelleyanne W.L. Chang  
Superior Court Judge

1 IT IS SO STIPULATED.

2  
3 Dated: \_\_\_\_\_, 2012

Philip Goalwin, individually and on behalf of  
Environmental Engineering Consulting &  
Remediation, Inc., dba E2C Remediation

6 Dated: \_\_\_\_\_, 2012

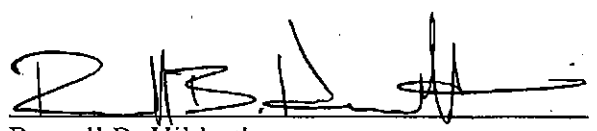
Debbie Goalwin, individually and on behalf of  
Environmental Engineering Consulting &  
Remediation, Inc., dba E2C Remediation

10 Dated: \_\_\_\_\_, 2012

State Water Resources Control Board  
By: Thomas Howard  
Its: Executive Director

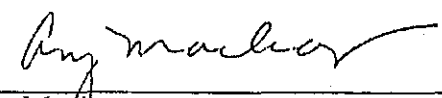
13 APPROVED AS TO FORM:

15 Dated: Jan. 14, 2012<sup>3</sup>

  
Russell B. Hildreth  
Deputy Attorney General  
Attorney for Plaintiffs


19 Dated: January 8, 2013

BAR NO. 215638  
275 BATTERY ST. #2000  
SAN FRANCISCO, CA 94111  
415-986-5900

  
Amy Maclear  
Gordon & Rees  
Attorney for Defendants Philip Goalwin,  
Debbie Goalwin, Environmental Engineering  
Consulting & Remediation, Inc., dba E2C  
Remediation

24 IT IS SO ORDERED:

26 Dated: Feb 14, 2012

  
Hon. Shelleyanne W. L. Chang  
Superior Court Judge  
RAYMOND M. CADEI

**DECLARATION OF SERVICE BY U.S. MAIL**

Case Name: *People v. E2C Remediation, et al.*

Case No.: **Sacramento County Superior Court Case No. 07AS04626**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On January 14, 2013, I served the attached **STIPULATION RE: MOTION TO ENFORCE JUDGMENT AND MODIFICATION OF STIPULATED JUDGMENT** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Dion N. Cominos Amy Maclear GORDON & REESE, LLP 275 Battery St., Ste. 2000 San Francisco, CA 94111	Attorneys for Defendants Philip Goalwin, Debbie Goalwin, Environmental Engineering Consulting & Remediation, Inc., dba E2C Remediation (formerly known as E2C Remediation, LLC"),
--	---

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 14, 2013, at Sacramento, California.

Rochelle Uda-Quillen

Declarant



Signature

CLERK OF SUPERIOR COURT  
COUNTY OF SACRAMENTO

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