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Attorneys for Petitioner

B. BRAUN US PHARMACEUTICAL MANUFACTURING LLC

**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

In the Matter of

**B. BRAUN US PHARMACEUTICAL
MANUFACTURING LLC**
[Facility ID No. 117290],

Petitioner,

vs.

**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,**

Respondent.

Case No. 4780-5

**STIPULATION TO PLACE MATTER ON
CONSENT CALENDAR**

[Filed in Support of Petition for Modification
of an Existing Variance]

Hearing Date: January 30, 2025

Time: 9:30 a.m.

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

The parties, the South Coast Air Quality Management District (“South Coast AQMD” or “Respondent”) and B. Braun US Pharmaceutical Manufacturing LLC (“Pharma” or “Petitioner”) do hereby stipulate and agree as follows:

1. This matter may be placed on the Hearing Board’s Consent Calendar to be heard on January 30, 2025;
2. The Petitioner seeks extension of the compliance deadlines in the Regular Variance originally issued by the Hearing Board on December 21, 2023, and as extended by the Hearing Board on October 24, 2024;
3. The Declarations of Peter Klaes (President/General Manager, Pharma), Aniekan

1 Udobot (Sr. Project Manager II, Pharma), Tim Hellem (Head of EHS, Pharma), and Maia H.
2 Jorgensen (Attorney, Hogan Lovells US LLP) may be submitted to the Hearing Board and entered
3 into evidence in support of Petitioner’s Findings and Order (Stipulated);

4 4. The parties request the Hearing Board to decide this matter based upon the
5 Declarations of Peter Klaes, Aniekan Udobot, Tim Hellem, and Maia H. Jorgensen; the Proposed
6 Findings and Decision and Order; and prior evidence and testimony before the Hearing Board
7 including, in particular, the Declarations of Peter Klaes, Tim Hellem, Aniekan Udobot, and
8 Michael Davidek filed with the Hearing Board on December 8, 2023, and the further Declaration of
9 Aniekan Udobot filed with the Hearing Board on August 30, 2024;

10 5. The parties agree on the Proposed Findings and Decision and Order (filed
11 concurrently with this Stipulation) submitted to the Hearing Board in support of the Petition for
12 Modification of an Existing Variance;

13 6. The parties agree that the granting of the requested extension under the
14 Proposed Order is not expected to result in a violation of Health and Safety Code Section
15 41700; and

16 7. The South Coast AQMD does not oppose the Petitioner’s request for the
17 granting of an extension to comply with the regular variance.

18 8. Based on all of the evidence in this case, the parties stipulate the Hearing Board
19 decide this matter on the Consent Calendar.

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1 **SO STIPULATED:**

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3 DATE: January 23, 2025

B. BRAUN US PHARMACEUTICAL MANUFACTURING
LLC

4
5 By:  _____
6 J. Tom Boer Esq.
7 Hogan Lovells US LLP
8 Attorneys for Petitioner

9
10 DATE: January 23, 2025

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
OFFICE OF THE GENERAL COUNSEL

11 By:  _____
12 Mary Reichert
13 Senior Deputy District Counsel
14 Attorneys for Respondent

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