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Refer To File #: 400718-0001

**BY EMAIL**

May 16, 2012

Kent Aue  
Engineering Geologist  
California Water Quality Control Board  
San Francisco Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Re: Comments to Tentative Order of San Francisco Bay Regional Water Quality Control Board for Adoption of Site Cleanup Regulations for the property located at 622/630 Jackson Street, Fairfield, CA, Solano County

Dear Mr. Aue:

We write with comments to the Regional Water Board's April 13, 2012 tentative order.<sup>1</sup>

**A. Neither PCE nor PCE derivative compounds were ever discharged from 622-630 Jackson Street.<sup>2</sup>**

The tentative order's position that "it does not appear that PCE was used and discharged at the Site" is undisputed. None of the retail establishment operating at the property discharged PCE. Solano Printers and Fairfield Printing Company both used alcohol based solvents and did not discharge PCE. Singh's Imported Car Service sold cars—it did not repair them—and did not discharge PCE. Gillespie Cleaners did not discharge PCE because if solvents were used during the time it operated at the site, they were likely Stoddard Solvents.

We request that the Regional Water Board clarify its order regarding PCE or PCE derivative compounds, which could not have been discharged from businesses operating at 622-630 Jackson Street. There is no evidence from testing which has been conducted or site history to conclude that PCE or its derivatives were discharged there.

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<sup>1</sup> We preserve for appeal all points raised in this letter, our February 17, 2012 site history, November 28, 2011 objection letter, November 17, 2011 presentation, and the comments and cover letter submitted on October 26, 2011.

<sup>2</sup> The Regional Water Board issued a requirement for technical report on May 11, 2012, and requested questions or comments by May 16, 2012, three business days later. Given the interplay of facts between the tentative order and requirement for technical report, and limited time period to prepare substantive comments to the request, we intend for our objections to the tentative order to apply equally to the request for technical report. Should the Regional Water Board not sustain our objections at the July 11, 2012 hearing, we reserve the right to object to the requirement for a technical report before its due date of August 31, 2012.



**B. The Regional Water Board should not hold Tegtmeier Associates, Inc. responsible for any alleged discharge of Stoddard Solvent by Gillespie Cleaners in 1945 and 1946.**

**(i) The record of Gillespie Cleaners' operations on Jackson Street.**

Robert Dittmer testified at his deposition that Gillespie Cleaners operated on Jackson Street from at least 1940 or 1941 to at least as late as 1943. Deposition of Robert Dittmer at 155:23-156:11<sup>3</sup> Gillespie Cleaners is referenced in The Solano Republican, on microfiche in the downtown Fairfield library. Gillespie Cleaners advertised its operations on Jackson Street in the early and mid-1940s. It was announced in the newspaper that Gillespie Cleaners was moving from Jackson Street to 1250 Texas Street in January, 1946.

**(ii) Moore & Tegtmeier and Tegtmeier Associates, Inc.'s operations.**

Moore & Tegtmeier purchased 622-630 Jackson Street on or about February 5, 1945. Subsequently, the partnership was dissolved. Tegtmeier Associates, Inc. was incorporated in 1971. In March, 1972, our client John Tegtmeier became one of three shareholders in Tegtmeier Associates, Inc.. Tegtmeier Associates, Inc. sold 622-630 Jackson Street in 1999. As the sole living shareholder of Tegtmeier Associates, Inc., our 74 year old client operates a company that controls two small properties leased to movie theatres.

**(iii) The evidence linking Tegtmeier Associates, Inc. to the alleged discharge of Stoddard Solvent by Gillespie Cleaners in 1945 and 1946 does not justify a clean up order by the Regional Water Board.**

**(a) It is unclear whether Gillespie Cleaners' operations at 622-630 Jackson Street overlapped with Moore & Tegtmeier's ownership of the property.**

It has not been proven that Gillespie Cleaners' operations at 622-630 Jackson Street overlapped with Moore & Tegtmeier's ownership of 622-630 Jackson Street.

Robert Dittmer testified that Gillespie Cleaners operated on Jackson Street from 1940 or 1941 until at least 1943, but could not confirm that it operated there after that date. Deposition of Robert Dittmer at 155:23-156:11. The Solano Republican contained advertisements that Gillespie Cleaners announced in January, 1946 that it was moving its operations. Based on this record, it is unclear if Gillespie Cleaners was actually doing business at 622-630 Jackson Street when Moore & Tegtmeier bought the property because it has been reported that the premises were destroyed by a fire during this time period. Our research indicates that Gillespie Cleaners moved from Jackson Street to 1250 Texas Street because its operations burned to the ground.<sup>4</sup>

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<sup>3</sup> Relevant excerpts from the deposition of Robert Dittmer are attached as Exhibit A.

<sup>4</sup> See Exhibit 20 to the Deposition of Robert Dittmer at 2 (Attached as Exhibit B) ("1250 Texas Street. Built by Bernard Gillespie for his dry cleaning and fur storage business after fire had destroyed his building on Jackson Street").



- (b) Assuming *arguendo* that Gillespie Cleaners operated at 622-630 Jackson Street during Moore & Tegtmeier's ownership of the property, there is no evidence that Gillespie Cleaners discharged Stoddard Solvent in 1945 or 1946.**

Assuming that Moore & Tegtmeier's ownership of the site overlapped with Gillespie Cleaners' operations on the site, there is no evidence that Gillespie Cleaners ever used or discharged Stoddard Solvent into the soil or groundwater. Dry cleaning machines during this time were vented. Their fumes and drying exhaust were expelled into the atmosphere in the same way as modern tumble drier exhaust. The cleaning solvent was lost in the atmosphere, not the ground.

- C. Tegtmeier Associates, Inc. does not have the financial resources to undertake any work ordered by the Regional Water Board.**

Tegtmeier Associates, Inc. does not have insurance to pay for any work ordered by the Regional Water Board.

Attempting to comply with clean up ordered by the Regional Water Board will likely bankrupt Tegtmeier Associates, Inc. before the work can be completed. Tegtmeier Associates, Inc. will incur no financial benefit to counterbalance the expenditures that would be necessary to comply with the Regional Water Board's proposed order.

**D. Conclusion**

In the absence of proof that Gillespie Cleaners operated at 622-630 Jackson Street during the period that Moore & Tegtmeier owned the property there should be no clean up ordered against this historical property owner. As previously mentioned, there is no evidence that Gillespie Cleaners performed dry cleaning operations on site using Stoddard Solvent. Laundries, which were far more common during the World War II era did not use solvents to wash clothes. Unless and until it can be established that Gillespie Cleaners did not burn down and was operating on site when Moore & Tegtmeier owned the property and that Stoddard Solvents were used in dry cleaning operations there, it would be inequitable for the Regional Water Board to conclude that Tegtmeier Associates, Inc. should be held responsible for the clean up of Stoddard Solvent in the soil or groundwater.

We request based on the investigation to date, that the Regional Water Board decline to issue a clean up order pertaining to the present or former owners of 622-630 Jackson Street.

Respectfully submitted,

Christopher A. Nedeau  
Nossaman LLP

# EXHIBIT A

**In The Matter Of:**

*Michael McInnis v.*

*Jewell Hirsch*

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*Robert Dittmer*

*March 8, 2012*

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**Min-U-Script® with Word Index**

<p style="text-align: right;">Page 130</p> <p>(14:50-14:52)</p> <p>1 consultants besides Genesis Engineering and</p> <p>2 Redevelopment and Versar to investigate contamination at</p> <p>3 the Texas Street property?</p> <p>4 <b>A. Not to my knowledge.</b></p> <p>5 Q. To date, how much have you paid to Genesis</p> <p>6 Engineering for its investigation work at the -- for the</p> <p>7 Texas Street property?</p> <p>8 <b>A. Nothing.</b></p> <p>9 Q. Has your insurance company --</p> <p>10 <b>A. You're talking about me personally?</b></p> <p>11 Q. Yes?</p> <p>12 <b>A. Oh, yeah, or Mike and I personally together?</b></p> <p>13 Q. Well, let's start with you. How much have you</p> <p>14 paid to Genesis Engineering to investigate the</p> <p>15 contamination at the 901 to 905 Texas Street property?</p> <p>16 <b>A. I don't recall any money being paid.</b></p> <p>17 Q. Do you know if Mike McInnis has paid any, or</p> <p>18 paid any money to Genesis Engineering?</p> <p>19 <b>A. To my knowledge, he has not.</b></p> <p>20 Q. As far as Versar is concerned, how much money</p> <p>21 have you paid, if any, to Versar to investigate the</p> <p>22 contamination at 901 to 905 --</p> <p>23 <b>A. None.</b></p> <p>24 Q. -- Texas Street property?</p> <p>25 <b>A. None. To my knowledge.</b></p>	<p style="text-align: right;">Page 132</p> <p>(14:53-14:55)</p> <p>1 <b>A. That's correct.</b></p> <p>2 Q. Do you know if Mr. McInnis has ever received a</p> <p>3 bill from the Regional Water Quality Control Board for</p> <p>4 expenses incurred as a result of contamination at 901 to</p> <p>5 905 Texas Street?</p> <p>6 <b>A. Not to my knowledge.</b></p> <p>7 Q. I want to refer you back to <u>Exhibit 23</u>. And it</p> <p>8 appears that as was discussed earlier, this is a letter</p> <p>9 to Mr. John Kaiser at the California Regional Water</p> <p>10 Quality Control Board from one of your consultants,</p> <p>11 Versar Inc., disclosing to them the release of</p> <p>12 environmental contaminants has occurred at the 901 to</p> <p>13 905 Texas Street property; is that correct?</p> <p>14 <b>MR. GRAHAM:</b> Objection, the document speaks for</p> <p>15 itself. Go ahead and answer.</p> <p>16 <b>A. Well, yeah, what it says is what it says.</b></p> <p>17 <b>BY MR. PRICE:</b></p> <p>18 Q. Subsequent to this letter to the Regional Water</p> <p>19 Quality Control Board, did the Regional Water Quality</p> <p>20 Control Board existence an enforcement action against</p> <p>21 you or Mr. McInnis?</p> <p>22 <b>MR. GRAHAM:</b> Objection, vague and ambiguous,</p> <p>23 calls for speculation. Go ahead, to the extent you</p> <p>24 know, you can answer.</p> <p>25 <b>A. I don't know. I'd have to ask my attorney what</b></p>
<p style="text-align: right;">Page 131</p> <p>(14:52-14:53)</p> <p>1 Q. Thank you.</p> <p>2 To your knowledge, has the Regional Water</p> <p>3 Quality Control Board incurred costs to investigate the</p> <p>4 contamination at 901 and 905 Texas Street property?</p> <p>5 <b>MR. GRAHAM:</b> Objection, vague and ambiguous.</p> <p>6 Give me one second. Go ahead. You can answer.</p> <p>7 <b>A. Have -- give me the question again?</b></p> <p>8 <b>MR. PRICE:</b> Let me rephrase it.</p> <p>9 <b>BY MR. PRICE:</b></p> <p>10 Q. Do you know if the Regional Water Quality</p> <p>11 Control Board has incurred expenses as part of</p> <p>12 investigating the contamination at the 901 to 905 Texas</p> <p>13 Street property?</p> <p>14 <b>MR. GRAHAM:</b> Same objections.</p> <p>15 <b>MR. PRICE:</b> You can answer, Mr. Dittmer.</p> <p>16 <b>THE WITNESS:</b> Is that right?</p> <p>17 <b>MR. GRAHAM:</b> Yeah, thank you.</p> <p>18 <b>A. To my knowledge, I've never seen a bill, that I</b></p> <p>19 <b>don't -- so.</b></p> <p>20 <b>BY MR. PRICE:</b></p> <p>21 Q. You've never received a bill from the Regional</p> <p>22 Water Quality Control Board --</p> <p>23 <b>A. That's correct.</b></p> <p>24 Q. -- for investigating the contamination for 901</p> <p>25 to 905 Texas Street?</p>	<p style="text-align: right;">Page 133</p> <p>(14:55-14:57)</p> <p>1 <b>paperwork he got.</b></p> <p>2 <b>BY MR. PRICE:</b></p> <p>3 Q. Do you know if the Regional Water Quality</p> <p>4 Control Board sent a letter in response to this release</p> <p>5 disclosure dated July 14, 2000 --</p> <p>6 <b>MR. GRAHAM:</b> Objection, vague and ambiguous.</p> <p>7 <b>BY MR. PRICE:</b></p> <p>8 Q. -- to you?</p> <p>9 <b>A. I don't recall.</b></p> <p>10 Q. If I can draw your attention back to Exhibit --</p> <p>11 <u>Exhibit 11</u>. This is a document that appears to be an</p> <p>12 agreement dated September 29th, 1981 between you, Lois</p> <p>13 Dittmer -- is that your wife?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. -- you, Lois Dittmer, Michael McInnis and</p> <p>16 Marianne McInnis, and Obie Goins, Lucilla Goins,</p> <p>17 John Blue Jr, Laverne Blue, Ray L. Johnson and</p> <p>18 Judy Johnson; did Mr. McInnis prepare this document?</p> <p>19 <b>A. I don't know. I have no way of knowing.</b></p> <p>20 Q. Do you recall drafting this agreement?</p> <p>21 <b>A. I did not. The answer is, I did not draft it.</b></p> <p>22 Q. Thank you.</p> <p>23 Mr. Dittmer, have you ever met Obie Goins?</p> <p>24 <b>A. I presume I have, but I don't particularly</b></p> <p>25 <b>recall anything about it.</b></p>

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<p>(15:18-15:20)</p> <p>1 A. I don't recall.</p> <p>2 Q. What's the earliest time you ever remember</p> <p>3 taking clothes to Gillespie Cleaners?</p> <p>4 A. I presume -- I'm not supposed to presume -- I</p> <p>5 would think when I was in high school maybe.</p> <p>6 Q. Would you do that, or would your mom do that?</p> <p>7 A. Probably a little of each.</p> <p>8 Q. If I could ask you, I don't want you to</p> <p>9 presume, I want what you can recall. I want your memory</p> <p>10 of the first time you ever remember taking clothes to</p> <p>11 Gillespie Cleaners?</p> <p>12 A. I don't have a recollection of the first time I</p> <p>13 ever took drycleaning to Gillespie Cleaners.</p> <p>14 Q. So is it fair to say the only time you</p> <p>15 remember, that you can tell me the story of, is the time</p> <p>16 where you got all the stains on your clothes?</p> <p>17 A. We took them before that, took them after that,</p> <p>18 but that was the outstanding time that I remember for</p> <p>19 Gillespie Cleaners.</p> <p>20 Q. So earliest time you can remember is 1943, and</p> <p>21 you think you took them sometime earlier, is that right?</p> <p>22 A. No, I think I can remember going there in</p> <p>23 probably the '40, '41, something like that, yeah.</p> <p>24 Q. Okay, that's a long time ago, I appreciate.</p> <p>25 I'm just trying to get as precise an answer I can if you</p>	<p>(15:21-15:24)</p> <p>1 time is 3:23 p.m. We're off the record.</p> <p>2 VIDEOGRAPHER: Back on the record. This is the</p> <p>3 beginning of videotape number three volume one in the</p> <p>4 deposition of Robert Dittmer. The time is 3:25 p.m. on</p> <p>5 March 8th, 2012.</p> <p>6 BY MR. NICKOVICH:</p> <p>7 Q. Sir, you have <u>Exhibit 20</u> in front of you, and</p> <p>8 that's a picture of the Gillespie Cleaners at Texas</p> <p>9 Street that we talked about earlier; do you recall that?</p> <p>10 A. Yes.</p> <p>11 Q. Did you ever go to Gillespie Cleaners when it</p> <p>12 was located at Texas Street?</p> <p>13 A. At this location?</p> <p>14 Q. Yes?</p> <p>15 A. Oh, I -- yes.</p> <p>16 Q. For how long did you go there?</p> <p>17 A. I don't remember.</p> <p>18 Q. Did you go there in the 1950s?</p> <p>19 A. I don't recall when they went out of business</p> <p>20 there, so I couldn't have gone to it after they went out</p> <p>21 of business, but I did go to them while it was in</p> <p>22 business there.</p> <p>23 Q. Could you hazard a guess at what year they went</p> <p>24 out of business?</p> <p>25 A. No.</p>
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<p>(15:20-15:21)</p> <p>1 don't mind.</p> <p>2 What can you say with accuracy is the earliest</p> <p>3 time you ever took clothes to Gillespie Cleaners?</p> <p>4 A. I really can't give you an accurate answer to</p> <p>5 that.</p> <p>6 Q. And every time you did that, 1943 that we know</p> <p>7 about, and maybe 1940, '41, where was Gillespie Cleaners</p> <p>8 located?</p> <p>9 A. Well, I don't have an address, so the</p> <p>10 description would be across the street from 625.</p> <p>11 Q. Got it. You testified earlier I think that</p> <p>12 Gillespie Cleaners operated at 1250 Texas Street; is</p> <p>13 that right?</p> <p>14 A. At 12 -- give me that question --</p> <p>15 Q. 1250 Texas Street?</p> <p>16 A. What was the question part?</p> <p>17 Q. I believe you testified earlier that Gillespie</p> <p>18 Cleaners operated at 1250 Texas Street?</p> <p>19 A. Well, at their new location. I don't recall</p> <p>20 the address of it, but their new building there, they</p> <p>21 operated there.</p> <p>22 MR. NICKOVICH: I need to take a quick break,</p> <p>23 sir.</p> <p>24 VIDEOGRAPHER: This is the end of videotape</p> <p>25 number two of the deposition of Robert Dittmer. The</p>	<p>(15:24-15:26)</p> <p>1 Q. Not even a ballpark?</p> <p>2 A. No.</p> <p>3 Q. Did you go to Gillespie Cleaners on Texas</p> <p>4 Street in the 1940s?</p> <p>5 A. They weren't on Texas Street in the '40s.</p> <p>6 Q. Okay, well, let's talk about that.</p> <p>7 You testified earlier today that Gillespie</p> <p>8 Cleaners moved to Texas Street right after World War II;</p> <p>9 is that correct?</p> <p>10 A. Moved to Texas Street after World War II, when</p> <p>11 the government released the cement and steel and what</p> <p>12 have you, yes.</p> <p>13 Q. Do you know the precise year when they opened</p> <p>14 up shop on Texas Street?</p> <p>15 (Reporter clarification.)</p> <p>16 Q. Do you know the precise year when Gillespie</p> <p>17 Cleaners opened up shop on Texas Street?</p> <p>18 A. No.</p> <p>19 Q. Could it have been 1946? Is that correct?</p> <p>20 A. I don't know.</p> <p>21 Q. So you have no idea when they opened up shop on</p> <p>22 Texas Street --</p> <p>23 MR. GRAHAM: Asked and answered. Give him the</p> <p>24 same answer.</p> <p>25 BY MR. NICKOVICH:</p>

<p style="text-align: right;">Page 154</p> <p>(15:26-15:27)</p> <p>1 Q. -- is that correct?</p> <p>2 MR. GRAHAM: You can answer.</p> <p>3 THE WITNESS: What was the question then?</p> <p>4 BY MR. NICKOVICH:</p> <p>5 Q. I just want to make sure I have your testimony</p> <p>6 accurate. You told me they were not on Texas Street in</p> <p>7 the 1940s, I believe you testified to that; is that</p> <p>8 correct?</p> <p>9 A. I don't recall being asked that, but it sounds</p> <p>10 correct, they weren't on Texas Street in -- I don't</p> <p>11 recall when they opened. They could have been -- they</p> <p>12 could have been on Texas Street in the late 40s, I don't</p> <p>13 recall when they opened.</p> <p>14 Q. I just want to make sure this is clear. You</p> <p>15 don't, with any precision, know the year that Gillespie</p> <p>16 Cleaners opened on Texas Street; is that correct?</p> <p>17 A. That's correct.</p> <p>18 Q. So it could have been 1946; is that correct?</p> <p>19 MR. GRAHAM: Objection, calls for speculation.</p> <p>20 A. If I don't know, I don't know.</p> <p>21 BY MR. NICKOVICH:</p> <p>22 Q. We just know it was sometime after 1943; is</p> <p>23 that right?</p> <p>24 A. Say that again?</p> <p>25 Q. Based on your testimony today, it's my</p>	<p style="text-align: right;">Page 156</p> <p>(15:28-15:30)</p> <p>1 early as 1940 or 1941; is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. And you remember a very colorful story where</p> <p>4 someone took your clothes to Gillespie Cleaners in 1943,</p> <p>5 and at that time, Gillespie Cleaners was located on</p> <p>6 Jackson Street; is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. And you believed that they were located on</p> <p>9 Jackson Street after that time, but you don't know for</p> <p>10 how long; is that correct?</p> <p>11 A. That's correct.</p> <p>12 Q. At some point, you know that Gillespie Cleaners</p> <p>13 was located on Texas Street, but you don't know exactly</p> <p>14 when that happened, is that right?</p> <p>15 A. That's correct.</p> <p>16 Q. What is the latest possible date that Gillespie</p> <p>17 Cleaners could have been first located on Texas Street?</p> <p>18 A. I don't know.</p> <p>19 Q. When you took your clothes to be cleaned at</p> <p>20 Gillespie Cleaners on Jackson Street, did you ever look</p> <p>21 at the equipment that they had?</p> <p>22 A. No.</p> <p>23 Q. Did you ever talk to anyone that cleaned the</p> <p>24 clothes and asked them how they did it?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 155</p> <p>(15:27-15:28)</p> <p>1 understanding that you believe that Gillespie Cleaners</p> <p>2 existed on Jackson Street in 1943 --</p> <p>3 A. Yes.</p> <p>4 Q. -- okay.</p> <p>5 I don't believe you testified that you are</p> <p>6 aware that they existed on Jackson Street any time after</p> <p>7 that; is that correct?</p> <p>8 A. They were on Jackson Street after '43.</p> <p>9 Q. But you don't know how long, is that right?</p> <p>10 A. I don't know what year they left, yes, correct.</p> <p>11 Q. So sometime, a few years after that, you</p> <p>12 believe they left; is that right?</p> <p>13 MR. GRAHAM: Vague and ambiguous, calls for</p> <p>14 speculation. Go ahead.</p> <p>15 A. At some point they left, obviously. At what</p> <p>16 point they left, I don't know.</p> <p>17 BY MR. NICKOVICH:</p> <p>18 Q. All right, and when you took your clothes to be</p> <p>19 cleaned at Gillespie Cleaners when they were located on</p> <p>20 Texas Street, did you ever see them being cleaned, the</p> <p>21 clothes themselves?</p> <p>22 A. No.</p> <p>23 Q. So I want to make sure I have your testimony</p> <p>24 accurately reflected. You recall taking clothes to</p> <p>25 Gillespie Cleaners that was located on Jackson Street as</p>	<p style="text-align: right;">Page 157</p> <p>(15:30-15:31)</p> <p>1 Q. Did you ever look and see if they used any</p> <p>2 chemicals to clean the clothes?</p> <p>3 A. No.</p> <p>4 Q. Do you know if they even did use any chemicals</p> <p>5 to clean the clothes?</p> <p>6 A. No.</p> <p>7 Q. Do you have any knowledge about how they went</p> <p>8 about cleaning clothes at Gillespie Cleaners when it was</p> <p>9 located on Jackson Street?</p> <p>10 A. No.</p> <p>11 Q. Can you turn please to Exhibit 19. Can you</p> <p>12 please turn to the second page where earlier this</p> <p>13 morning you were directed to an advertisement that</p> <p>14 states "Gillespie Cleaners and Dyers"; do you see that?</p> <p>15 A. Yeah.</p> <p>16 Q. And there's no numerical address on that</p> <p>17 advertisement; is that correct?</p> <p>18 MR. GRAHAM: Objection, the document speaks for</p> <p>19 itself.</p> <p>20 A. It says "Jackson Street."</p> <p>21 BY MR. NICKOVICH:</p> <p>22 Q. And there's no number associated with that,</p> <p>23 though, correct?</p> <p>24 MR. GRAHAM: Objection, the document speaks for</p> <p>25 itself.</p>



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1 I have not, and shall not, offer or provide  
2 any services or products to any party's attorney or  
3 third party who is financing all or part of the action  
4 without first offering same to all parties or their  
5 attorneys attending the deposition and making same  
6 available at the same time to all parties or their  
7 attorneys. (Civ. Proc. § 2025.320(b))  
8 I shall not provide any service or product  
9 consisting of the deposition officer's notations or  
10 comments regarding the demeanor of any witness,  
11 attorney, or party present at the deposition to any  
12 party or any party's attorney or third party who is  
13 financing all or part of the action, nor shall I collect  
14 any personal identifying information about the witness  
15 as a service or product to be provided to any party or  
16 third party who is financing all or part of the action.  
17 (Civ. Proc. § 2025.320(c))

18  
19 Dated: MARCH 20, 2012  
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23  
24  
25

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1 DEPOSITION OFFICER'S CERTIFICATE  
2 (Civ.Proc. § 2025.520(e))  
3 STATE OF CALIFORNIA }  
4 COUNTY OF PLACER } ss.  
5  
6 I, DEBBIE MAYER , hereby certify:  
7 I am the deposition officer that  
8 stenographically recorded the testimony in the foregoing  
9 deposition.  
10 Written notice pursuant to Code of Civil  
11 Procedure, Section 2025.520(a), having been sent, the  
12 deponent took the following action within the allotted  
13 period with respect to the transcript of the deposition:  
14 ( ) In person, at the office of the  
15 deposition officer, made the changes set forth on the  
16 original of the transcript. (The parties attending the  
17 deposition have been notified of said changes.)  
18 ( ) Approved the transcript by signing it.  
19 ( ) Refused to approve the transcript by not  
20 signing it.  
21 ( ) By means of a signed letter, made the  
22 changes and approved or refused to approve the  
23 transcript as set forth therein. (Said letter has been  
24 attached to the original transcript and copies thereof  
25 mailed to all parties attending the deposition.)

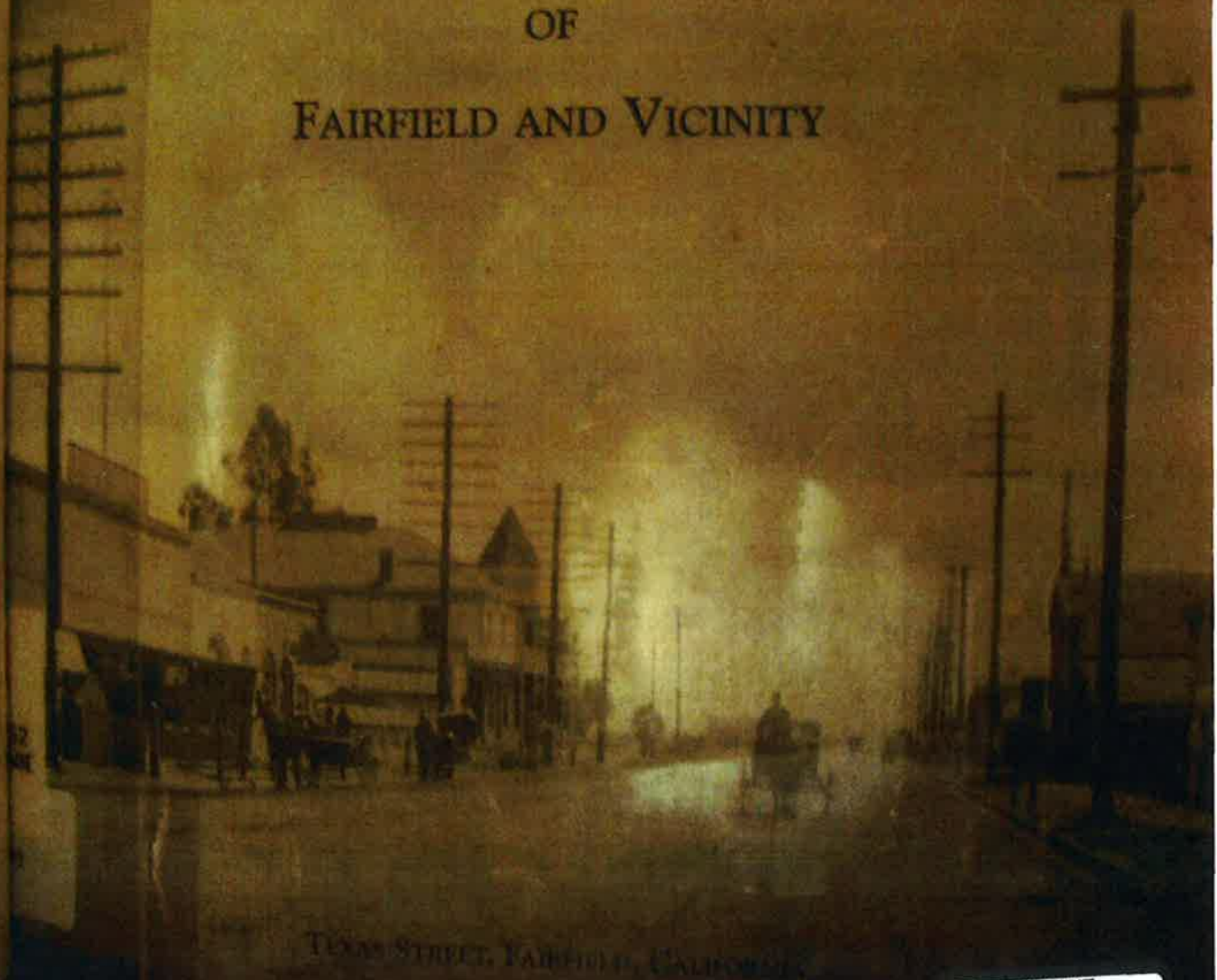
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1 ( ) Failed to approve the transcript within  
2 the allotted time period.  
3 Dated \_\_\_\_\_.  
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# EXHIBIT B

# THE HERITAGE COLLECTION

SITES, STRUCTURES AND HISTORY  
OF  
FAIRFIELD AND VICINITY



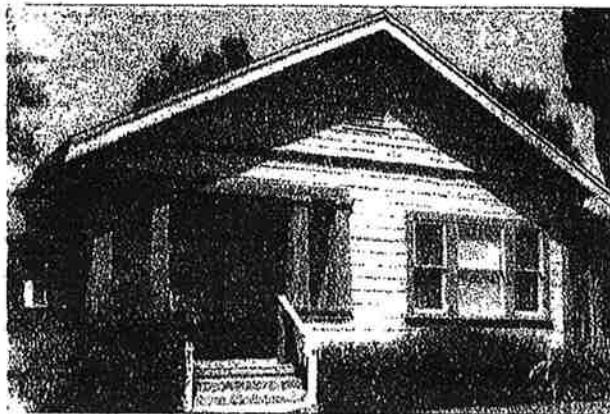
TEXAS STREET, FAIRFIELD, CALIFORNIA

EXHIBIT  
R. Dittmer 20  
3/8/12  
FENGAD 800-331-8989

and was installed on October 22, 1925. The lights were first turned on October 23, 1925.



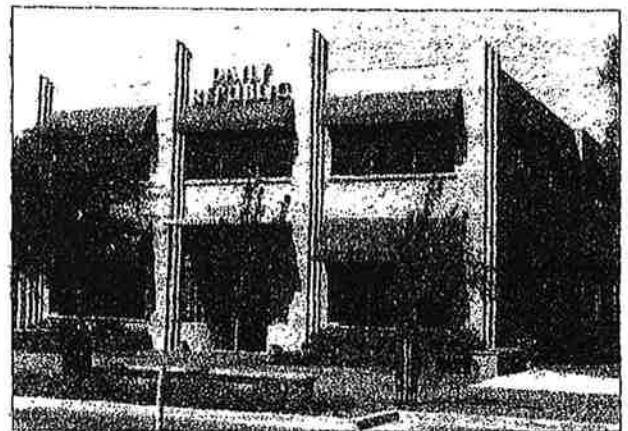
**1018 Texas Street.** Remodeled in the late 1930's by the Crowley family. The beautiful interior circular staircase was stabilized and an office, with its own entrance, was added to the east end of the building for Assemblyman Ernest Crowley. Although blind, Mr. Crowley served for 25 years in the State Assembly. His wife, Judge Georgia Crowley, served in the Justice Court of Solano County for 40 years.



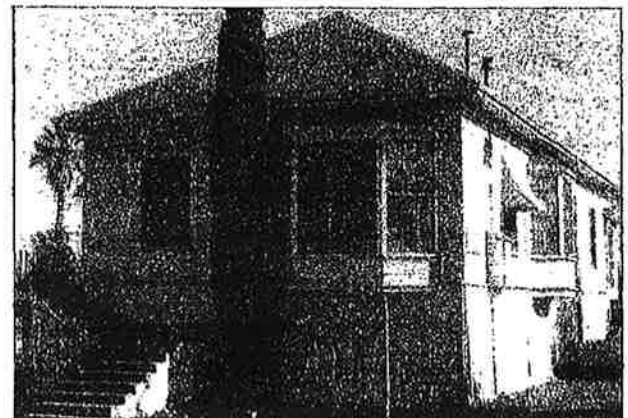
**1026 and 1046 Texas Street.** During the 1920's many bungalows were built using the simple

oblong plan with two or three steps leading up to an inset porch. To alter the appearance of the homes, a number of different roof lines were used. 1026 was the home of Lewis Morrill who was the County Clerk. The Corcoran family lived at 1046. Mr. Corcoran was the County Treasurer.

**1100 Texas Street.** For many years the only home on this block was that of J.B. Lemon, one of Fairfield's earliest residents. In 1928 the entire block was cleared for the development of the Deluxe Motel and Cafe. The John Lemon home was moved to Union Avenue.



**1250 Texas Street.** Built by Bernard Gillespie for his dry cleaning and fur storage business after fire had destroyed his building on Jackson Street. The recessed entrance of this streamlined modern building is flanked with curved glass brick sidelights, a new building technique in the 1930's and 40's.



**621 Missouri.** Home of E.N. Eager, the County Surveyor, and his daughter, Maybelle who was