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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
CIVIL ACTION No. 2484CV00414 G

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

HOLTEC PILGRIM, LLC and HOLTEC DECOMMISSIONING INTERNATIONAL, LLC,

Defendants.

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2024 FEB 21 P 3:08
JOHN E. POWERS III
ACTING CLERK MAGISTRATE

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT BETWEEN THE COMMONWEALTH OF MASSACHUSETTS AND HOLTEC PILGRIM, LLC AND HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

Plaintiff, the Commonwealth of Massachusetts (the "Commonwealth"), acting by and through the Attorney General and the Massachusetts Department of Environmental Protection (the "Department"), together with Defendants Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC (collectively "Defendants"), respectfully move this Court to approve the entry of final judgment in the form of the proposed Consent Judgment submitted with this Motion. Upon entry of the Consent Judgment, the Parties waive the entry of findings of fact and conclusions of law pursuant to Mass. R. Civ. P. 52 and waive all rights of appeal.

As grounds for this Motion, the Parties state:

1. The Commonwealth and Defendants have agreed to resolve the specific legal claims alleged against Defendants in the Complaint arising from Defendants' actions at the Site as set forth in the attached Consent Judgment.[1]

[1] Capitalized terms herein are defined as set forth in the Consent Judgment.

2. Entry of the Consent Judgment is in the public interest and reflects a negotiated agreement of the Parties. Subject to the terms of the Consent Judgment, Defendants will pay the Commonwealth a civil penalty pursuant to the Massachusetts Clean Air Act, G.L. c. 111, §§ 142A–O (the "Air Act").

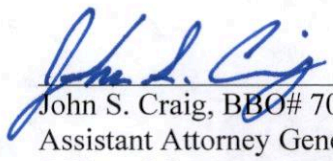
3. Entry of the Consent Judgment is in the interest of justice, there is no just cause for delay, and the Parties have consented to its entry as a final judgment in this case. Entry of the Consent Judgment will avoid prolonged and complicated litigation between the Commonwealth and the Defendants.

WHEREFORE, the Commonwealth and Defendants respectfully request that the Court enter the attached Consent Judgment in this civil action.

Respectfully submitted,

FOR THE COMMONWEALTH OF MASSACHUSETTS

ANDREA JOY CAMPBELL
ATTORNEY GENERAL



John S. Craig, BBO# 707067
Assistant Attorney General
Office of the Attorney General
One Ashburton Place, 18th Floor
Boston, MA 02108
John.Craig@mass.gov

Dated: February 21, 2024

HOLTEC PILGRIM, LLC and HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

By their attorneys,

/s/ *Rebecca M. Lecaroz*

Rebecca M. Lecaroz (BBO #666860)
BROWN RUDNICK LLP
One Financial Center
Boston, MA 02111
(617) 856-8200
rlecaroz@brownrudnick.com

Counsel for Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC

Dated: February 21, 2024