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Attorneys for Petitioner  
Milan REI X, LLC

**SOLID WASTE LOCAL ENFORCEMENT AGENCY  
COUNTY OF ORANGE HEALTH CARE AGENCY**

IN THE MATTER OF:

Rio Santiago Facility  
6145 E. Santiago Canyon Road  
Orange, California 92869  
SWIS No. 30-AB-0472

Milan REI X LLC (Property Owner)  
Petitioner.

**JOINT STATUS UPDATE AND  
[PROPOSED] ORDER TO CLOSE MATTER  
[Public Resources Code §§ 44310 *et seq.*]**

Petitioner Milan REI X, LLC (“Milan”) and Respondent, the Orange County Solid Waste Local Enforcement Agency (“LEA”) (collectively referred to herein as the “Parties”), by and through their respective counsel, hereby provide the following joint status update pursuant to the Order of the Hearing Officer entered on October 18, 2024 (“Order”), as subsequently amended.

**I. BACKGROUND**

On October 8, 2024, Milan filed a Request for Hearing (“Hearing Request”) regarding matters arising under the Stipulated Notice and Order (“Stipulated N&O”) entered into by and between the LEA and Milan, dated June 16, 2022. Thereafter, as set forth in the Order, the Parties jointly requested that the hearing be stayed to allow Milan to explore and potentially work out arrangements with the appropriate state agency with relevant expertise to consider matters at issue in the Hearing Request.

**II. VOLUNTARY OVERSIGHT BY REGIONAL BOARD**

On November 15, 2024, Milan submitted an application for a voluntary oversight agreement to the California Department of Toxic Substances Control ("DTSC"). On November 22, 2024, DTSC informed Milan that it received the application and was moving forward with the application process, including reviewing the application and conferring with the Santa Ana Regional Water Quality Control Board ("Regional Board") to determine the appropriate lead regulatory agency. On December 19, 2024, Milan was informed that the Regional Board was designated as the most appropriate lead regulatory oversight agency for the project.

On February 18, 2025, the Regional Board sent an Oversight Cost Reimbursement For Site Cleanup Program agreement to Milan. Milan executed the agreement on February 19, 2025. Since then, representatives of the Regional Board and the LEA have met and conferred with Milan, its consultant (Leighton (nka Verdantas)), and its counsel to transition the oversight of Milan's investigation to the Regional Board and to coordinate on the progression of the investigation. On behalf of Milan, Verdantas has prepared and submitted a number of documents to the Regional Board (with copies to the LEA) in furtherance of the investigation. The LEA, the Regional Board, Milan, and Verdantas continue to meet and communicate regularly to progress the work under the Stipulated N&O.

**III. STIPULATED NOTICE & ORDER AMENDMENT**

On April 7, 2025, Milan provided the LEA and Regional Board with the proposed amendment to the Stipulated N&O. Subsequently, the Parties exchanged drafts and have conferred on multiple occasions. *On October 31, 2025, the parties reached an agreement and executed the amendment to the Stipulated N&O. On November 14, 2025, Milan recorded the amendment with the County of Orange.*

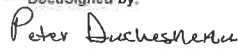
**IV. WITHDRAWAL OF HEARING REQUEST**

Concurrently herewith, Milan has filed a request that its Hearing Request be withdrawn. The LEA does not object. Given that the Parties were able to resolve the matters at issue in the Hearing Request as set forth above, the Parties believe that a further status conference with the Hearing Officer is not necessary and that this matter may be closed.

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Dated: November 14, 2025

MANATT, PHELPS & PHILLIPS, LLP

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By: \_\_\_\_\_  
Peter Duchesneau  
*Attorneys for Petitioner*  
MILAN REI X, LLC

Dated: November 14, 2025

OFFICE OF COUNTY COUNSEL

Signed by:  
  
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By: \_\_\_\_\_  
Joscelynn Gadzinski, Deputy  
*Attorneys for Respondent*  
ORANGE COUNTY SOLID WASTE LOCAL  
ENFORCEMENT AGENCY

~~PROPOSED~~ ORDER

Having considered the Parties' joint request and relevant legal authority, and for good cause appearing, the Hearing Officer rules as follows:

1. The Hearing Request is withdrawn.
2. No further status conference is necessary and the matter is closed.

Dated: November 17, 2025

*Deborah Pernice Knefel*

By: \_\_\_\_\_

Hearing Officer Deborah Pernice Knefel