

1
2
3
4 **BEFORE THE HEARING BOARD OF THE**
5 **BAY AREA AIR QUALITY MANAGEMENT DISTRICT**
6 **STATE OF CALIFORNIA**

7 AIR POLLUTION CONTROL OFFICER of the)
8 BAY AREA AIR QUALITY MANAGEMENT)
9 DISTRICT)

Complainant,

10 vs.

11 TESLA MOTORS, INC.

12 Respondent.
13
14
15

DOCKET NO.

JOINT MOTION TO ENTER PROPOSED
FINDINGS AND DECISION AND
STIPULATED CONDITIONAL
ABATEMENT ORDER

FILED

JUN 20 2024

HEARING BOARD
BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

16 Complainant Air Pollution Control Officer of the Bay Area Air Quality Management District
17 (APCO) and Respondent Tesla Motors, Inc. (Tesla) both stipulate to, and jointly request, the entry of the
18 stipulated proposed findings and decision and stipulated conditional abatement order attached hereto, with
19 the terms and conditions therein, pursuant to Health & Safety Code section 42451, subdivision (b). Health
20 & Safety Code section 42451, subdivision (b), allows the Hearing Board to issue an order for abatement
21 pursuant to the stipulation of the air pollution control officer and the person or persons accused of
22 violating any order, rule, or regulation prohibiting or limiting the discharge of air contaminants into the
23 air, upon the terms and conditions set forth in the stipulation. The Hearing Board must still include a
24 written explanation of its action in the order for abatement. The Parties believe the attached proposed
25 findings and decision and stipulated conditional abatement order meets these and all legal requirements
26 for the Hearing Board to issue it a stipulated conditional order for abatement.
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Dated: June 18, 2024

By: *Alexandra Kamel*
ALEXANDER G. CROCKETT, ESQ.
General Counsel
Alexandra Kamel
Senior Assistant Counsel
Counsel for
PHILIP M. FINE
Executive Officer/APCO
BAY AREA AIR QUALITY MANAGEMENT
DISTRICT

Dated: June 18, 2024

By: *Rick Rothman*
RICK ROTHMAN, ESQ.
DAVID K. BROWN, ESQ.
Counsel for
TESLA MOTORS, INC.