

LMVOC

/Mr. Bayley III

Mr. Resta

Miss Latta

(COPY TO EACH)

Save Our Wetlands, Inc. (SOWL) v. Early Rush, et al.
(Pontchartrain Hurricane Protection Project)

Counsel

19 Mar 76

McClain/jt/329

1. Attached hereto are copies of Plaintiff's REQUEST FOR ADMISSION UNDER RULE 36, Plaintiff's Motion for Permission to File an Amended Complaint and a copy of my letter to NOD of 19 Mar 76.
2. Based on discussions with Messrs. Towers and Chatry, it is believed that the matters covered in the attached pleadings are potentially of such a critical nature that proposed answers of the Government should be thoroughly coordinated with this office prior to filing.
3. A conference will be arranged on 26 March to discuss our participation in drafting the Government's responses.

3 Incl
as

JAMES A. McCLAIN

LMVOC

19 March 1976

SUBJECT: Save Our Wetlands, Inc. (SOWL) v. Early Rush, et al.

District Engineer, New Orleans, ATTN: LMNOC

1. Reference is made to your letter of 11 March 1976, subject as above, to OCE with information copy to this office, wherein you transmitted copies of the Plaintiff's REQUEST FOR ADMISSION UNDER RULE 36 and the Plaintiff's Motion to allow the Plaintiff to amend and supplement its original complaint.

2. In confirmation of telephone discussions of 18 March 1976, between Mr. Towers and the undersigned, it is requested that, due to the critical nature of the matters involved, prior to answering Part B of the Request for Admission and prior to answering the proposed amended complaint, draft responses and answers be coordinated with technical and legal personnel of this office. If necessary, in order to comply with the deadline for filing, a conference will be arranged between LMVD and NOD personnel.

FOR THE DIVISION ENGINEER:

JAMES A. McCLAIN
Division Counsel



DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P. O. BOX 60267
NEW ORLEANS, LOUISIANA 70160

LMNOC

11 March 1976

SUBJECT: Save Our Wetlands, Inc. (SOWL) v. Early Rush, District Engineer, US Army Corps of Engineers, New Orleans; Howard H. Callaway, Secretary, United States Army; Russel Train, Administrator, Environmental Protection Agency; and Guy Lemieux, President, Orleans Levee Board, USDC, ED, La., Civil No. 75-3710A(B)

HQDA (DAEN-GCK)
WASH DC 20314

1. Reference is made to previous report concerning commencement of litigation in the above-noted matter.
2. Inclosed are copies of the Federal defendant's answer and also copies of related motion and notice papers filed.

FOR THE DISTRICT ENGINEER:

2 Incl (trip)
as

JOSEPH A. TOWERS
District Counsel

CF: w incl
✓LMVOC