	)
IN THE MATTER OF:	)
Edward Franco	)
d/b/a El Paso Management	)
15 Rutland Square	)
Brockton, MA. 02301	Ś
	Ś
80 Bragdon Realty Trust	Ś
Carmen R. Vasquez as Trustee	Ś
3 Farrington Lane	Ś
Canton MA 02021	Ś
First West Fourth, LLC	
1372 Hancock Street Suite 401	
Quincy, Ma 02169	)
	)
	)
	)
	)
	)
Respondents.	)
	)

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May 29, 2012

## **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO PLEAD**

Respondent Edward Franco d/b/a El Paso Management, 80 Bragdon Realty Trust, First West Fourth Realty Trust (the "Respondent") hereby moves for an additional thirty-day extension of time, to file an answer to the Complaint and Notice of Opportunity for Administrative Hearing (the "Complaint"), filed by the United States Environmental Protection Agency, Region 1 (the "Complainant), dated March 29, 2012.

This is the second request for an extension of time relating to this action. The Respondent wants to continue to explore settlement possibilities and needs time to meet with representatives of the EPA. Settlement work is ongoing and a resolution is expected. The undersigned has spoken with the Complainant and Complainant consents to a thirty-day extension.

. . . . .

THE RESPONDENT, Edward Franco d/b/a El Paso Management

4 By:

Edward Franco d/b/a El Paso Management 80 Bragdon Realty Trust First West Fouth LLC Telephone: (508) 588-7744 Facsimile: (508) 588-5566