

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re:)	
)	NPDES Appeal No. 25-02
Permit applicant: Ocean Era, Inc.)	
Permitted facility: Velella Epsilon)	
NPDES Permit No. FL0A00001)	
_____)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

Pursuant to 40 C.F.R. § 124.19(g), Petitioner Friends of Animals seeks a ten-day extension of the deadline to file a reply to the response filed by the Environmental Protection Agency, Region 4 (“the Region”). The Region requested and received a 30-day extension to respond to Friends of Animals’ Petition, which it filed on August 15, 2025. Without an extension, Friends of Animals’ reply would be due on September 2, 2025. *See* 40 C.F.R. § 124.19(c)(2). This is Friends of Animals’ first request for an extension. In support of this motion Friends of Animals states the following:

Friends of Animals has scheduling conflicts based on other litigation matters.

Friends of Animals’ attorney will be out on previously scheduled vacation during the time to file its reply. In addition, Labor Day, a federal holiday, falls within the reply period.

Friends of Animals has conferred with counsel for the Region, who indicated that the Region does not oppose the granting of this extension. Friends of Animals also conferred with counsel in a related matter, NPDES Appeal No. 25-01M. Petitioners’ counsel in NPDES Appeal No. 25-01M indicated that Petitioners in that case may also seek an extension and do not oppose Friends of Animals’ request for an extension.

For the foregoing reasons, Friends of Animals respectfully requests that this motion for an extension of time be granted and that the time for Friends of Animals to file a reply be extended by ten days, until September 12, 2025.

Date: August 19, 2025

Respectfully submitted,

/s/Jennifer Best

Jennifer Best

Director, Wildlife Law Program

Friends of Animals

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CERTIFICATE OF SERVICE

I, Jennifer Best, hereby certify that on August 19, 2025, I served a true and correct copy of the foregoing Motion for Extension of Time through the EAB's e-filing system and through e-mail to the following:

For EPA:

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