

The Law Offices of
Cassandra Collier-Williams, LLC

Cassandra Collier-Williams, Esq.
Anthony T. Parker, Esq.
Aaron D. Plasco, Esq.

September 14, 2009

VIA FACSIMILE & MAIL

@ (312) 886-9697

Ms. LaDawn Whitehead
Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

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Re: In The Matter of: Kathryn Y. Lewis-Campbell, Springfield, Ohio
Docket Number: TSCA-05-2009-0004

Dear Ms. Whitehead:

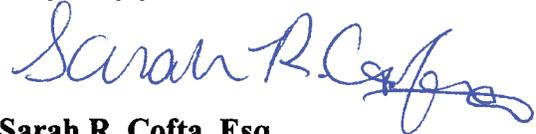
Enclosed please find the original and one (1) copy of the following document, relative to the above captioned matter:

1. Respondent's Motion for Extension of Time.

Please file the above in the normal manner, and return the time stamped copy to me in the enclosed self addressed stamped envelope.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Sarah R. Cofta, Esq.

SRC
Enclosures
cc: Kathryn Y. Lewis-Campbell

Cleveland Office:

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	DOCKET NO. TSCA-05-2009-0004
)	
KATHRYN Y. LEWIS CAMPBELL)	
SPRINGFIELD, OHIO)	
)	
U.S. EPA ID# OHD 106 483 522)	<u>MOTION FOR EXTENSION</u>
)	<u>OF TIME</u>
RESPONDENT.)	

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NOW COMES Respondent, Kathryn Y. Lewis-Campbell, by and through her undersigned counsel, ***The Law Offices of Cassandra Collier-Williams, LLC***, and hereby requests this Honorable Court to grant her an extension of time to file her ***Brief in Opposition to Complainant's Motion for Accelerated Decision on Liability and Appropriate Penalty***. The basis for this motion is as follows:

As the Court knows, this area of law is complex, and therefore Respondent's counsel must familiarize herself with all aspects of the relevant law before being able to make a proper answer to Complainant's Motion. Due to counsel's extensive travel schedule, especially in August and September 2009, she has not been able to dedicate as much time on this brief as is necessary to fully analyze the Respondent's legal arguments. Since the Respondent believes that she is not in violation of the EPA's Disclosure Rules, and that no penalty should be assessed against her, she should be given an extension of time to file her brief.

Respondent asserts that granting an extension of time to file her brief will not cause any prejudice to the parties, as she is requesting an extension before

the deadline. Further, should it become necessary, Respondent will not object to any request for an extension of time on behalf of the Complainant, to reply to the Respondent's brief.

This motion is being made for the above stated reasons only, and not for purposes of undue delay.

WHEREFORE, for the foregoing reasons, Respondent, Kathryn Y. Lewis-Campbell respectfully requests this Honorable Court grant her ***Motion for Extension of Time***, and give her until September 30, 2009 to file her brief.

Respectfully submitted,

THE LAW OFFICES OF CASSANDRA COLLIER-WILLIAMS, LLC



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Kathryn Lewis Campbell

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2009, a copy of the foregoing was delivered via facsimile and regular U.S. mail to the following:

1. La Dawn Whitehead
Regional Hearing Clerk (E-13J)
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

2. Richard R. Wagner (C-14J)
Senior Attorney, Office of Regional Counsel
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Chicago, IL 60604

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Counsel for Complainant

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3. Judge William B. Moran
U.S. Environmental Protection Agency
Office of Administrative Law Judges
1200 Pennsylvania Ave., N.W.
Mail Code 1900L
Washington, DC 20005



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