

MANKO GOLD KATCHER FOX

AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

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March 3, 2015

Via Overnight Mail

Helen Ferrara
Regional Judicial Officer
U.S. Environmental Protection Agency
Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

PHILADELPHIA, PA
*CHERRY HILL, NJ
WILLIAMSPORT, PA
by appointment only

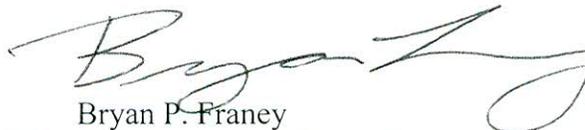
*Partner responsible – Bruce S. Katcher

Re: Docket No. CWA-02-2015-3401

Dear Ms. Ferrara:

Enclosed please find a Motion requesting an extension of time to file an Answer in the matter of The Skydyne Company, Docket No. CWA-02-2015-3401. Please contact me if you have any questions.

Respectfully submitted,



Bryan P. Franey
For MANKO, GOLD, KATCHER & FOX, LLP

BFP/nav/12368-001

Enclosure

cc: Karen Maples, Regional Hearing Clerk (Via Overnight Mail)
Kara Murphy, Office of Regional Counsel (Via Email and First Class Mail)

U.S. Environmental
Protection Agency-Reg 2
2015 MAR -4 AM 10:47
REGIONAL HEARING
CLERK

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

U.S. Environmental
Protection Agency-Reg 2

2015 MAR -4 AM 10: 47

REGIONAL HEARING
CLERK

In the Matter of: :

The Skydyne Company :
100 River Road :
Port Jervis, New York :

Docket No. CWA-02-2015-3401

Respondent. :

MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Pursuant to 40 C.F.R. § 22.16, Respondent, The Skydyne Company (“Skydyne”), requests that the Regional Judicial Officer grant a sixty (60) day extension of time for Respondent to file an Answer in this proceeding.

Respondent received the Complaint on February 9, 2015. Respondent’s Answer to the Complaint is currently due by March 11, 2015.

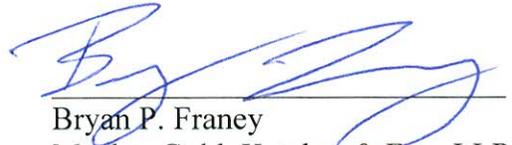
The parties conferred by telephone on February 25, 2015 and both parties expressed an interest in a possible settlement of this matter. The parties intend to hold further discussions concerning this matter within the next two to three weeks. Accordingly, Respondent believes that, at this time, the parties’ resources would best be spent on settlement negotiations rather than on preparation of an Answer to the Complaint.

Kara Murphy, EPA Region 2 legal counsel in this proceeding, stated via email on February 26, 2015 that EPA would not oppose this motion.

Respondent therefore respectfully requests that the Regional Judicial Officer grant this motion for a sixty (60) day extension of time, from March 11, 2015 to May 11, 2015 for Respondent to file its Answer.

Respectfully submitted,

Dated: March 3, 2015



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Attorney for Respondent
The Skydyne Company

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Extension of Time to File an Answer was delivered in the following manner to the addressees listed below:

Original and One Copy by Overnight Mail:

Karen Maples, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor (Room 1631)
New York, NY 10007-1866

One copy by Overnight Mail:

Helen Ferrara, Regional Judicial Officer
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

One copy by First Class Mail and E-mail:

Kara Murphy, Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, NY 10007-1866

Date Sent: 3/3/15

Signed: _____

