

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 2**

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG. II  
2008 JUL 22 AM 10:51  
REGIONAL HEARING  
CLERK

**IN THE MATTER OF:**

**Desarrollos de la Vega, Inc.**

**Respondent**

**Jardines de Arecibo Pump Station  
PO Box 9932  
San Juan, Puerto Rico 00908-9932**

**Defendant**

**Docket NO. CWA-02-2008-3351**

**Proceeding Pursuant Section 309(g) of  
the Clean Water Act, 33 U.S.C. 1319(g)-  
to Assess Class I Civil Penalty**

**MOTION REQUESTING EXTENSION OF TIME  
TO FILE ANSWER TO THE COMPLAINT**

**TO: Regional Hearing Clerk  
U. S. EPA Region 2  
290 Broadway, 16th floor  
New York, New York 10007-1866**

Comes now Respondent, Desarrollos de la Vega, Inc., through the undersigned counsels and very respectfully STATE and PRAY as follow:

1. In the present case, the undersigned counsels were just recently assigned the defense of the action.

2. In the time since the case has been assigned to the undersigned counsels, it has not been possible to complete a review of the allegations, study the documents available, and interview the clients in order to draft an answer to the Complaint. In addition, the undersigned attorneys and Respondent personnel had

previously scheduled to be away from the office on vacation prior to receiving assignment of the case.

3. For the reasons expressed above, the undersigned counsels believe an additional term to expire on the 30<sup>th</sup> of August will be necessary in order to file an adequate answer to the Complaint.

4. The extension of time hereby requested does not cause unnecessary delays in the proceedings of this case.

WHEREFORE, it is respectfully requested that the present motion be granted and the appearing Respondent be awarded until August 30, 2008 to file an answer to the Complaint.

RESPECTFULLY REQUESTED,

In San Juan, Puerto Rico this 17<sup>th</sup> date of July, 2008.

I HEREBY CERTIFY: that a true and exact copy of the foregoing document has been sent by certified mail to: Lourdes del Carmen Rodriguez, Esq., Assistant Regional Counsel, Office of Regional Counsel/CT, U.S. Environmental Protection Agency, Region 2, 1492 Ponce de Leon Avenue, Suite 417, Centro Europa Building, San Juan, Puerto Rico 00907-4127; Wanda Garcia, Chief, Water Quality Division, PREQB, PO Box 11488, San Juan, PR 00910.

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