

RESPONDENT'S MOTION FOR EXTENSION OF TIME TO
ANSWER EPA ADMINISTRATIVE COMPLAINT AND NOTICE
OF OPPORTUNITY FOR A HEARING

Pursuant to the Consolidated Rules of Practice, 40 CFR Part 22, Respondent hereby moves for an extension of time of twenty (20) days within which to file an Answer to EPA's Administrative Complaint and Notice of Opportunity for Hearing ("Complaint").

In support of this motion, Respondent states as follows:

1. This is Respondent's first request for an extension of time in which to Answer the Complaint.
2. Response to the Complaint is currently due on Thursday October 24, June 25, 2019, based on service of the complaint on Respondent on September 24, 2019.
3. Additional time is needed for filing of an Answer/negotiating a settlement because Respondent was out of the country and returned two weeks ago and has not retained counsel and is still in the process of reviewing all documents referred to in the Complaint, which are the subject of allegations therein.
4. Respondent has communicated by telephone with EPA counsel; and he has indicated that we may represent that EPA would not object to such request.
5. WHEREFORE, Respondent respectfully moves for an extension of an additional twenty (20) days within which to file its Answer to the Complaint.

Dated: October 24, 2019

By: 

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