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May 5, 2011

**VIA FEDERAL EXPRESS**

Karen Maples, Regional Hearing Clerk  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866

**RE: *Chase, et al, Respondents***  
**Docket No. RCRA-02-2011-7503**


Dear Ms. Maples:

I enclose herewith the original and one copy of the Motion for Extension of Time to File Answer regarding the above matter.

Thank you for your consideration in this regard.

Very truly yours,

STAFFORD, PILLER, MURNANE,  
PLIMPTON, KELLEHER & TROMBLEY, PLLC

  
By: Thomas W. Plimpton, Esq.

TWP/taf

Enclosures

CC: Hon. Helen Ferrera, Judicial Officer  
Lee Spielmann, Esq.

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
2011 MAY -6 A 11: 25  
REGIONAL HEARING  
OFFICE

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

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In the Matter of: Andrew B. Chase, a/k/a Andy  
Chase, Chase Services, Inc., Chase Convenience  
Proceeding Under Section 9008 of the Solid  
Waste Disposal Act, as amended.

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**MOTION FOR EXTENSION**

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
2011 MAY -6 A 11:25  
FEDERAL COURTS  
WASHINGTON, D.C.


THOMAS W. PLIMPTON, ESQ., affirms to the Court, under penalty of perjury,  
the following:

1. I am an attorney duly licensed to practice law in the State of New York, and a member of the firm of Stafford, Piller, Murnane, Plimpton, Kelleher & Trombley, PLLC, and attorney for the Respondents in the above matter. I make this Affirmation in support of Respondents' Motion for Extension of Time to File an Answer.
2. The Respondents were served by certified mail with a copy of the Complaint on or about April 9 or 10, 2011.
3. I spoke to the attorney for this matter, Lee Spielmann, regarding a 30 day extension, and Mr. Spielmann graciously consented to this request.

4. It is respectfully requested that Respondents be granted an extension of time in which to file and serve an Answer on or before June 9, 2011.

WHEREFORE, Respondents respectfully request that an extension of time be granted to file an Answer on or before June 9, 2011.

DATED: May 5, 2011.



THOMAS W. PLIMPTON, ESQ.