

From: ronclever@aol.com
To: [Lisa, Joseph](#)
Cc: [Goldman, Andrew](#); [Esposito, Bevin](#)
Subject: from Atty. Ron Clever
Date: Wednesday, July 07, 2021 8:50:58 AM

Dear Judge Lisa,

I have agreed to help in a *pro bono* case. The lawyer who has been handling that case has never done a Commonwealth Court brief, so I agreed to help the project, by doing that appellate work.

Unfortunately, the deadline in that case is July 7, and it cannot be extended (it already was extended several times, BEFORE I was involved).

In the case that I have before Your Honor, my brief is due July 9. This other project has jumped directly in the way of my EPA project.

Would Your Honor please consent to the instant request: to extend the July 9 date to July 16?

Here is the initial position of Mr. Goldman, as he stated it in an e-mail to me:

RJO Lisa made clear in his email of June 12 that no further extensions would be granted absent extraordinary circumstances. The RJO was assigned to this matter 21 months ago. Turog asked for, and received, 4 extensions of time to file its opening brief. Per Turog's requests, the hearing was delayed for 11 months. The hearing was more than 3 months ago. You are now preparing to request a third extension of time to file your post-hearing brief. It seems to me that, if the RJO believes your third request for an extension is based on extraordinary circumstances, it matters not whether EPA agrees with or opposes the request. EPA will not join your request, and will likely defer to the RJO if our position is requested by the RJO.

I hope he doesn't mind that I have cut-&-pasted, here, his initial response to me. He appears to have reserved the right to take a different position, upon receiving the instant e-mail.

Even taking into account the objections stated by Mr. Goldman, I respectfully submit that a very small 6-day extension is not too much to ask, in order to make room in my life for doing this *pro bono* project. It is a request for only a 6-day extension.

Thank you.

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