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 Attorneys for Respondent,  
 Ferro Corporation

U.S. ENVIRONMENTAL  
 PROTECTION AGENCY-REG. II  
 2012 MAY -4 A 10:23  
 REGIONAL HEARING  
 CLERK

UNITED STATES  
 ENVIRONMENTAL PROTECTION AGENCY  
 BEFORE THE ADMINISTRATOR

|                    |   |                             |
|--------------------|---|-----------------------------|
| In the Matter of:  | ) |                             |
|                    | ) |                             |
| FERRO CORPORATION, | ) | Docket No. CAA-02-2011-1217 |
|                    | ) |                             |
| Respondent.        | ) |                             |

**MOTION FOR EXTENSION OF TIME**

Comes now Respondent, Ferro Corporation, by and through its counsel, pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. §22.7(b)) and respectfully requests an additional ninety (90) day extension of time to file its Answer and Request a Hearing and as good cause therefore states as follows:

Respondent received the Complaint on September 30, 2011. Respondent requested additional time to engage in an informal settlement conference with the Complainant. Respondent and Complainant also needed to establish a date for the informal settlement conference. On October 18, 2011, Your Honor kindly issued an Order Granting an Extension of Time until December 30, 2011 to file the Answer.

Respondent and Complainant engaged in an informal settlement on November 15, 2011. Respondent requested and on December 7, 2011, Your Honor kindly issued an additional sixty (60) day extension until February 29, 2012 to allow for the exchange of settlement documents. Further, on February 10, 2012, Respondent and Complainant requested and on February 14, 2012, Your Honor kindly issued an additional ninety (90) day extension through May 29, 2012. Respondent and Complainant respectfully request an extension through June 30, 2012 to exchange settlement documents.

Prior to filing this Motion, the undersigned contacted the opposing party as to the extension requested herein and said opponent indicated that it does not oppose the Motion.

May 3, 2012  
Date

Ellen Radow Sadat  
Ellen Radow Sadat, Esq.

I certify that the foregoing MOTION FOR EXTENSION OF TIME, dated, May 3, 2012, was sent this day in the following manner to the addressees listed below:

Original by Overnight Mail to: Karen Maples  
Regional Hearing Clerk  
United States Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866

Copy by Overnight Mail and facsimile to:

Attorneys for Complainant:

Kara E. Murphy and Jacob Hollinger  
Assistant Regional Counsel  
U.S. EPA, Region 2  
290 Broadway, 16th Floor  
New York, New York 10007  
Tel: (212) 637-3211 and (212) 637-3228  
Fax: (212) 637-3199

Presiding Judge: The Honorable Helen S. Ferrara  
Regional Judicial Officer  
United States Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor  
New York, New York 10007-1866

  
Ellen Radow Sadat, Esq.

Dated: May 3, 2012