

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1- NEW ENGLAND**

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In the Matter of:	)	
	)	Docket No.
APLUS TRUCK SALES, INC.	)	CAA-01-2021-0077
	)	
Respondent.	)	
_____	)	

**MOTION FOR EXTENSION OF TIME TO ANSWER**

Respondent, APlus Truck Sales, Inc., moves for an extension of time for Respondent to file and Answer in the above-captioned action. The current due date for Respondent's Answer is Wednesday, August 18<sup>th</sup>, 2021. This Motion seeks a 30-day extension of that deadline to Friday, September 17<sup>th</sup>, 2021.

Respondent and EPA are actively discussing the possibility of settlement which process is likely to include a substantive review of relevant financial information. Additional time is needed to complete that process of review and, as appropriate and necessary, prepare settlement terms. Counsel received a request on August 3, 2021 from the EPA with a list of items requested. Counsel has worked diligently to provide said documents and as of the date of filing this motion, we are one document short of the items requested. Counsel is hopeful that this document can be provided August 20<sup>th</sup>.

Respectfully submitted,

Respondent: /s/ Leonard Sharon  
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## CERTIFICATE OF SERVICE

I, Leonard I. Sharon, Esq., attorney for Respondent, hereby certify that on August 17, 2021 a copy of the *Motion for Extension of Time to Answer* was sent, in PDF format, via e-mail to the Regional Hearing Clerk at [R1\\_Hearing\\_Clerk\\_Filings@epa.gov](mailto:R1_Hearing_Clerk_Filings@epa.gov) and [Santiago.Wanda@epa.gov](mailto:Santiago.Wanda@epa.gov) and to the Complainant's counsel served by PDF format to [rivers.tahini@epa.gov](mailto:rivers.tahini@epa.gov) and by first class mail, postage prepaid, upon counsel for the Complainant, as indicated below:

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Dated at Lewiston, Maine, this 17 day of August, 2021.

/s/ Leonard Sharon

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