

SCOLARO, SHULMAN, COHEN, FETTER & BURSTEIN, P.C.

ATTORNEYS AND COUNSELORS AT LAW

SYRACUSE • NEW YORK • ROCHESTER
BOCA RATON, FLORIDA • STUART, FLORIDA

60 EAST 42ND STREET, 40TH FLOOR
NEW YORK, NEW YORK 10165
TELEPHONE (315) 471-8111
FAX (315) 471-1355

WWW.SCOLARO.COM

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Direct Dial: (315) 477-6206
Direct Fax: (315) 425-3606
Email: sbreiner@scolaro.com

°RICHARD S. SCOLARO
OF COUNSEL

CAROL A. CHRISTIANSEN
TIMOTHY J. CAPPUCILLI
SHANE M. MCCROHAN
ANDREW M. KNOLL, M.D.
ZACHARY R. BENJAMIN
JENNIFER L. ALFIERI
°STEVEN A. WALKER
SARAH E. BREINER

°ALSO ADMITTED TO FL BAR
°ALSO ADMITTED TO MA BAR
°ALSO ADMITTED TO MI BAR
°ALSO ADMITTED TO NJ BAR
°ALSO ADMITTED TO PA BAR
°ALSO ADMITTED TO WA BAR

BERNARD J. LAWLER
(1940-1998)

U.S. ENVIRONMENTAL
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BARRY M. SHULMAN
STEPHEN H. COHEN°
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MICHAEL J. COMPAGNI
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JEFFREY B. SCHEER°
JOHN R. APPLER
AMY B. EGITTON
DOUGLAS J. MAHR
MICHAEL J. HRAB
ROBERT D. SCOLARO°°

Via Express Mail

Regional Hearing Clerk
U.S. EPA, Region 2
290 Broadway, 16th Floor
New York, New York 10007-1866

Re: In the Matter Of: R. B. Robinson Contracting, Inc.
Docket No.: SDWA-02-2011-8901

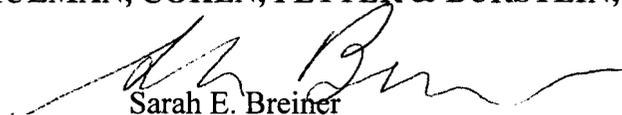
Dear Sir or Madam:

In accordance with Sections 22.16 and 22.5 of Title 40 of the United States Code of Federal Regulations, enclosed please find one (1) original and one (1) copy of the Motion for Extension of Time to Answer Complaint, being submitted to the Presiding Regional Judicial Officer in connection with the above referenced proceeding.

Should you require anything further, please do not hesitate to contact the undersigned.

Sincerely,

SCOLARO, SHULMAN, COHEN, FETTER & BURSTEIN, P.C.


Sarah E. Breiner

Enclosure

cc: R. B. Robinson Contracting, Inc. (Attn: Mr. Robert Robinson) (Via First Class Mail)
Diane T. Gomes, Esq. (Via First Class Mail)
Hon. Helen Ferrara, RJO (Via Express Mail)

525160.1

BEFORE THE PRESIDING REGIONAL JUDICIAL OFFICER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, NEW YORK

IN THE MATTER OF

R. B. ROBINSON
CONTRACTING, INC.,

Respondent.

Docket No: SDWA-02-2011-8901

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2010 DEC -9 P 2:47
REGIONAL HEARING
OFFICE
NEW YORK

MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT

R. B. Robinson Contracting, Inc. ("Respondent"), the respondent in this matter, by and through its attorneys, Scolaro, Shulman, Cohen, Fetter & Burstein, P.C., and with the concurrence of the United States Environmental Protection Agency ("EPA"), moves for an extension of time until January 14, 2011 to submit its answer to the Complaint issued by the EPA in connection with this matter. The Respondent requests additional time to prepare and file its answer to the Complaint to ensure an orderly presentation of its answer, and to further explore the possibility of settlement with the EPA.

For the reasons stated above, the Respondent respectfully requests an extension of time until January 14, 2010 to submit its answer to the Complaint issued by the EPA.

Dated: December 8, 2010

Respectfully submitted,



Sarah E. Breiner, Esq.
SCOLARO, SHULMAN, COHEN, FETTER
& BURSTEIN, P.C.
Attorneys for Respondent
Office and Post Office Address
507 Plum Street, Suite 300
Syracuse, New York 13202
Telephone: (315) 471-8111

525160.1

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT in the matter of R. B. Robinson Contracting, Inc., Docket No. SDWA-02-2011-8901, Candor, New York 13743

Diane T. Gomes, Esq.
Assistant Regional Counsel
Water & General Law Branch
Office of Regional Counsel
U.S. EPA, Region 2
290 Broadway - 16th Floor
New York, New York 10007

Dated: December 8, 2010



Sarah E. Breiner, Esq.
SCOLARO, SHULMAN, COHEN, FETTER
& BURSTEIN, P.C.
Attorneys for Respondent
Office and Post Office Address
507 Plum Street, Suite 300
Syracuse, New York 13202
Telephone: (315) 471-8111