UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

In the Matter of:

CUTTING EDGE ENTERPRISES, INC. Forest Lake, Minnesota,

Respondent.

Proceeding to Assess a Civil Penalty Pursuant to the Clean Air Act Section 205(c)(1) Docket No CAA-05-2024-0004

MOTION FOR EXTENSION OF TIME TO ANSWER

TO: The U.S. EPA Region 5 Regional Judicial Officer, Ann Coyle, coyle.ann@epa.gov; and Authorized Agent, Louise Gross, Associate Regional Counsel, U.S. EPA, Region 5, gross.louise@epa.gov; Andrew Futerman, Attorney Advisor; U.S. EPA Region5, futerman.andrew@epa.gov; and Michael D. Harris Division Director, Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 5, harris.michael@epa.gov.

The Respondent, Cutting Edge Enterprises, Inc., by and through its undersigned attorney, respectfully moves the Court for an Order enlarging the time to file its Answer to the Complaint and Notice of Opportunity for Hearing pursuant to 40 C.F.R. § 22.7(b), due to Respondent seeking replacement or additional counsel. As grounds, Cutting Edge Enterprises, Inc., offers the following:

The current deadline for Cutting Edge Enterprises, Inc., to file its response is June 8, 2024. Respondent's counsel in this matter is seeking a 30-day extension to file the response to give Respondent and its new attorneys more time to confer.

Prior to submitting this request, Respondent's counsel conferred with Louise Gross and Andrew Futerman who directed counsel to the rules on how to file a motion for an extension of time to answer. There was no indication either way if they objected to this motion.

Based on the foregoing information, Cutting Edge Enterprises, Inc.,, through its undersigned attorney, respectfully requests enlarging the time to file its response to Complaint and Notice of Opportunity for Hearing to July 8, 2024.

Respectfully submitted,

MESENBOURG & SARRATORI LAW OFFICES, P.A.

Dated: June 7, 2024

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