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May 19, 2025

**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED & E-MAIL**

Ms. Helen Ferrara  
Regional Judicial Officer  
U.S. Environmental Protection Agency, Region 2  
290 Broadway, 16<sup>th</sup> Floor (Room 1631)  
New York, NY 10007-1866  
[Ferrara.Helen@epa.gov](mailto:Ferrara.Helen@epa.gov)

**Re: In the Matter of Donjon Marine Co., Inc.**  
**Docket No. MPRSA-02-2025-6001**

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Dear Ms. Ferrara:

On behalf of Donjon Marine Co., Inc. ("Donjon"), in the above-referenced action, I am writing to respectfully request an additional 30-day extension of time to file an Answer and a Hearing Request, which currently is due by Tuesday, May 20, 2025. As such, the new requested deadline to respond would be June 19, 2025.

The parties are continuing to engage in settlement negotiations and have made significant progress in resolving this matter. By way of an update, Donjon provided EPA with its most recent written proposal for a potential settlement on May 15, 2025. While the parties continue to engage in these negotiations, Donjon wishes to preserve its right to file an Answer and Hearing Request. As such, Donjon respectfully submits that good cause exists for this request. We have discussed this matter with counsel for EPA, and they do not have any objections to Donjon's request for the extension.

Please do not hesitate to contact me should you have any questions.

Very truly yours,



GAIL H. CONENELLO

Cc (via email):

Karen Maples, Regional Hearing Clerk

Zoe Oldham, Water and General Law Branch, EPA R2

Phyllis Feinmark, Manager, Water and General Law Branch, EPA R2

Patricia Pechko, Water Division, Dredging, Sediment and Ocean Section, EPA R2