

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

**AFFIDAVIT OF
PAUL SARRATORI**

STATE OF MINNESOTA)
) ss.
COUNTY OF ANOKA)

Attorney Paul P. Sarratori, Mesenbourg & Sarratori Law Offices, P.A., being first duly sworn upon oath, hereby state and allege as follows:

1. I am an attorney duly licensed to practice law in the State of Minnesota and in Federal Court, in the District of Minnesota and have been retained to represent Respondent, Cutting Edge Enterprises, Inc., in the above-captioned matter.
2. I am submitting this affidavit in support of Respondent's Second Motion to Enlarge Time to provide an answer in the above-entitled action.
3. Respondent originally hired me to negotiate a settlement of this matter prior to the EPA filing this action. Now that this matter is progressing to a court matter, Cutting Edge is seeking replacement or additional counsel.
4. I did contact Ms. Gross on May 20, 2024, to schedule a settlement conference and at that time was informed that a meeting would not be scheduled until an answer was filed. Since that time Respondent and I have been in contact, and it was decided that replacement or additional counsel would be necessary to provide Respondents with the best possible representation as I am new to this area of practice. Cutting Edge identified replacement counsel, but that counsel became unavailable to handle the matter. They then identified a new counsel but because of the lateness of

contacting the new counsel and the fourth of July holiday, a meeting was unable to be arranged until today.

5. Prior to submitting this motion, I emailed opposing counsel who has advised they do not intend to oppose a motion for continuance. See attached email.
6. Respondents through counsel have been in contact with government counsel since 2019.
7. Respondents are entitled to a competent and complete defense. I request the court grant an additional 14-day extension to for them to provide an answer.

FURTHER YOUR AFFIANT SAYETH NOT.

I declare under penalty of perjury that everything that I have stated in this document is true and correct.

Dated: July 8, 2024



Paul P. Sarratori