

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2

U.S. ENVIRONMENTAL  
PROTECTION AGENCY-REG.II  
2012 AUG 21 P 2: 25

REGIONAL HEARING  
CLERK

<b>IN MATTER OF</b>  <b>Municipality of Moca</b> <b>PO Box 1571</b> <b>Moca, Puerto Rico 00676-1571</b>  <b>RESPONDENT</b>	<b>COMPLAINT AND NOTICE OF</b> <b>OPPORTUNITY FOR HEARING</b>  <b>INDEX No. CAA-02-2011-1216</b>
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**MOTION REQUESTING EXTENTION OF TIME TO SUBMIT JOINT SET OF  
STIPULATED FACTS, EXHIBITS AND TESTIMONY**

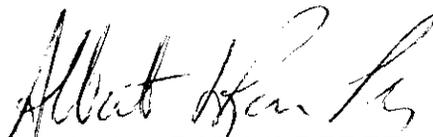
Here comes respondent represent by the undersigned attorney who's  
ALLEGED, PRAY and REQUEST as follows,

1. That on July 10, 2012, the undersigned attorney sent an e-mail to Ms. Carolina Jordan regarding the next joint motion that needs to be submitted on July 20, 2012, and no response was received from Ms. Jordan.
2. That on July 20, 2012, Ms Jordan submits a Motion requesting extension of time and informing that she was out of the office for several weeks, due to medical reason.
3. That the undersigned attorney was on vacation outside Puerto Rico, from July 16 to August 6, 2012.
4. That today I returned from vacation and in the afternoon I received via regular mail the order issued by the Honorable M. Liza Bischmann, granted until today August 6, 2012 to submit the Joint Motion.
5. That immediately I call Ms. Carolina Jordan, to see if we can produce the Joint Set of Stipulated Facts today, but is too late.
6. That Ms. Jordan and the undersigned Attorney agree to request 10 additional days to submit the Joint Motion.

Therefore Respondent respectfully requests an extension of time of 10 days to submit the Joint Set of Stipulated Facts, Exhibits and Testimony.

I certify that copy of this motion was sent to Ms. Carolina Jordan-Garcia, Esq.  
Offices of Regional Counsel, US. EPA- Region 2, US Environmental Protection  
Agency-Region 2, City View Plaza II Suite 7000, #48 RD. 165 Km 1.2, Guaynabo,  
PR 00968-8069

Respectfully submitted today August 6, 2012.



**ALBERTO L. RAMOS PEREZ**  
**USDC NO 209905**  
**PO BOX 750**  
**MERCEDITA, PR. 00715**  
**TEL. (787) 284-2971**  
**FAX. (787) 284-6292**  
**e-m:alberto\_ramosperez@yahoo.com**

Subject: Proxima Fecha – Municipio de Moca  
From: alberto ramos (alberto\_ramosperez@yahoo.com)  
To: Jordan-Garcia.Carolina@cpamail.epa.gov;  
Date: Tuesday, July 10, 2012 6:44 PM

Lcda. Jordan:

La proxima fecha es el 20 de julio del 2012, donde debemos someter una mocion conjunta con la hechos estipulados , exhibits y testimonios.

Alberto Ramos